

Stakeholder Engagement Plan (SEP) for Balıkesir-1 Wind Farm in Balıkesir, Turkey



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September 2011
Report No.: AECOM-TR-R456-01-00

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List of Acronyms

| | |
|-----------------|---|
| EBRD | European Bank for Reconstruction and Development |
| EIA | Environmental Impact Assessment |
| EMRA | Turkish Energy Market Regulatory Authority |
| Enerjisa | Enerjisa Enerji Üretim A.Ş. |
| ESIA | Environmental and Social Impact Assessment |
| ESAP | Environmental and Social Action Plan |
| NGO | Non-governmental Organization |
| NTS | Non-Technical Summary |
| PDR | Project Description Report |
| PIP | Public Information Policy |
| PR | Performance Requirement |
| REC | Regional Environmental Center |
| SEP | Stakeholder Engagement Plan |
| SO | Stakeholder Organization |
| TEIAS | Turkish Electricity Transmission Co |
| TEMA | Turkish Foundation for Combating Soil Erosion, for Reforestation and Protection of Natural Habitats |
| UNECE | United Nations Economic Commission for Europe |
| WWF | World Wild Life Foundation |

1.0 Introduction

Enerjisa Enerji Üretim A.Ş. (Enerjisa) proposes to develop Balıkesir-1 Wind Farm Project (the Project) with an installed capacity of 142.5 MW in Balıkesir Province of Turkey. The Project will annually generate 549.2 GWh of electrical energy through 52 wind turbines (General Electric 2.75 – 103).

The 154 kV capacity energy transmission line, connected to the Poyraz WFP - Balıkesir Transformer Station II energy transmission line, was approved on June 23, 2010 by Turkish Electricity Transmission Co. (TEIAS).

Enerjisa has been granted a 49-year Generation License (EU/1167-6/839, dated April 18, 2007) for the proposed Project under the provisions of Law No. 4628 governing the electricity market in the Republic of Turkey from the Turkish Energy Market Regulatory Authority (EMRA).

In accordance with the Environmental Impact Assessment (EIA) Regulation, published Official Gazette No. 26939 and dated July 7, 2008, a Project Description Report (PDR) (a preliminary EIA report) is required for the projects included in the Annex II of this regulation. Since this project is included in the Annex II of the regulation, a PDR was prepared and submitted to the Balıkesir Provincial Directorate of Environment and Forestry. The project secured an “Environmental Impact Assessment not Required” decision on November 29, 2007, and this decision was a development consent and enabled the proposed Project to secure other permits required by the relevant Turkish regulations.

Enerjisa has contracted with AECOM to prepare the supplementary documents according to the EBRD requirements. The review of the PDR has pointed out the need for preparation of a Stakeholder Engagement Plan (SEP) as required by *PR10 Information Disclosure and Stakeholder Engagement* for the disclosure purpose of the EBRD.

The purpose of this SEP is to determine people or communities that could be affected by the project and to ensure that stakeholders are properly engaged in environmental and social issues of the Project and to maintain a constructive relationship with stakeholders on an ongoing basis. Hence, this plan identifies the legal framework including the stakeholders, consultation methods and the grievance mechanisms.

2.0 Legal Framework and Requirement for Public Consultation

2.1 Turkish Legislation

The Environmental Law (No. 2872), which was published in Turkish Official Gazette No. 18132 dated August 11, 1983 and revised in Turkish Official Gazette No. 26167 dated May 13, 2006 (Law No. 5491) provides the legislative framework for the regulation of industries and their potential impact on the environment. Environmental Impact Assessment (EIA) Regulation describes the requirements for information disclosure and public participation for the projects subject to the EIA regulation.

Unlike the public consultation process for the Annex I projects, the EIA Regulation does not require a public participation meeting and has a very limited public disclosure process for the projects listed in Annex II. The project is listed under Annex II. The general procedure for the Annex II projects is described below.

The projects that are listed under Annex II should prepare a PDR and apply to the related Provincial Directorate of Environment and Forestry according to the format given in Annex IV of the EIA Regulation. The Provincial Directorate then reviews the report and may ask for more detailed information on the project or request specific analysis or measurements in the project area. After reviewing and the assessment, the Provincial Directorate gives a final decision as “EIA is not Required” or “EIA is Required” for the proposed project. Finally, the Provincial Directorate informs the related parties and announces this decision to the public. An “EIA is not Required” decision means that the proposed project does not need to prepare and submit a detailed EIA report to the Ministry of Environment and Forestry (its name is changed as Ministry of Environment and Urbanization). The project obtains other permits according to the other relevant Turkish regulations. An “EIA is Required” decision means that the project should be evaluated in detail according to the EIA procedures outlined in the EIA regulation and the proposed project should obtain its approval from the Ministry of Environment and Urbanization.

As described above, there is no public participation meeting and consultation process for the project in Annex II. There is only an announcement of the final decision at the end of the review procedure by the Provincial Directorates. However, for Annex I projects, there is a public participation meeting and other processes of public consultation and the grievance mechanisms described as in the EIA regulation.

Although there was no public consultation requirement for the Project within the scope of Turkish EIA procedure, public participation meetings were held and a socio-economic survey was conducted within the scope of environmental impact assessment study.

2.2 EU Legislation

The EU EIA Directive (85/337/EEC) describes the impact assessment procedure for a wide range of defined public and private projects, which are defined in Annexes I and II of the Regulation. The

Directive is in force since 1985. It has been amended three times, in 1997, in 2003 and in 2009. The amendments of 2003 (2003/35/EC) was seeking to align the provisions on public participation with the *Aarhus Convention* on public participation in decision-making and access to justice in environmental matters.

Article 6 of the Directive describes public consultation and engagement process. It is stated that the public concerned should be given early and effective opportunities to participate in the environmental decision-making procedures. Reasonable time-frames for the different phases should be provided allowing sufficient time for informing the public and for the public concerned to prepare and participate effectively in environmental decision-making. It is stated that the detailed arrangements for informing the public (for example by bill posting within a certain radius or publication in local newspapers) and for consulting the public concerned (for example by written submissions or by way of a public inquiry) should be determined by each Member States. Article 6 also lists the information that should be made available to public for their opinion.

2.3 EBRD Requirements

The EBRD sets its requirements on information disclosure and stakeholder engagement in the following documents:

- EBRD Environmental and Social Policy (2008); and
- EBRD Public Information Policy (2008).

2.3.1 EBRD Stakeholder Engagement Requirements

The EBRD Board of Directors approved Environmental and Social Policy and Performance Requirements on 12 May 2008. This policy entered into force six months after its adoption and supersedes the EBRD's 2003 Environmental Policy for the projects receiving initial approval after the entry into force of the Environmental and Social Policy.

It should be noted that wind power plants are classified as Category B projects since environmental and/or social impacts of wind power plants are typically site-specific, and/or readily identified and addressed through mitigation measures. Although, wind farm projects are not listed in the Appendix-1: Category A projects in the EBRD's Environmental and Social Policy document, due to the capacity and the size of the Balıkesir-1 WFP (i.e., 52 turbines), the Project is classified as a Category A.

The EBRD expects clients to identify and interact with their stakeholders on an ongoing basis, and to engage with potentially affected communities through disclosure of information, consultation, and informed participation in a manner deemed by the Bank to be commensurate to the impacts associated with the project. Such stakeholder interaction should be consistent with the spirit, purpose and ultimate goals of the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (*Aarhus Convention*), the EU Environmental Impact Assessment Directive and, for projects with the potential to have significant environmental impact across international

boundaries, the UNECE Convention on Environmental Impact Assessment in a Transboundary Context (*Espoo Convention*), regardless of the status of ratification.

Bank-financed projects are expected to meet good international practice related to sustainable development. To help clients and/or their projects achieve this, the Bank has defined specific Performance Requirements for key areas of environmental and social issues and impacts. Beside these performance requirements, **Performance Requirement (PS) 10** called as **Information Disclosure and Stakeholder Engagement** and sets out the Bank's requirements for clients to identify stakeholders potentially affected by their projects, disclose sufficient information about issues and impacts arising from the projects and consult with stakeholders in a meaningful and culturally appropriate manner.

According to PS 10, the EBRD defines *Stakeholder Engagement* is an ongoing process to be began at the earliest stage of project planning and continue throughout the life of the project.

Requirements related with stakeholder engagement can be listed as follows:

- Stakeholder engagement should be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.
- In stakeholder engagement process, various individuals or groups who are affected or likely to be affected (directly or indirectly) by the project ("affected parties"), or may have an interest in the project ("other interested parties") should be identified. Resources for public information and consultation should focus on affected parties, in the first instance. The client should also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. An adequate level of detail must be included in the stakeholder identification and analysis so as to enable the Bank to determine the level of communication that is appropriate for the project under consideration.
- If the project is classified as Category A, the client will engage in a scoping process with identified stakeholders to ensure identification of all key issues to be investigated as part of the Environmental and Social Impact Assessment (ESIA) process. The scoping process should also facilitate development of a Stakeholder Engagement Plan for the project. As part of the scoping process, stakeholders should be able to provide comments and recommendations on the draft Stakeholder Engagement Plan and any other scoping documents. A Stakeholder Engagement Plan is also required by the EBRD for Balıkesir-1 Wind Farm Project.
- The client should inform the EBRD how communication with the identified stakeholders will be handled throughout project preparation and implementation, including the type of grievance procedure. Clients should also inform the EBRD of any information provided or consultation activities conducted prior to approaching the EBRD for financing.

The EBRD requires that information disclosed must include a full EIA/SIA report in accordance with the Bank's requirements. In addition, for private sector projects that require an environmental impact assessment, the EBRD requires that the EIA report is in the public domain for 60 days prior to consideration of the project by the Board of Directors.

The EBRD requires that the client should establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled and resolved effectively.

2.3.2 EBRD Public Information Policy

EBRD Public Information was published in September 2008. The Public Information Policy (PIP) sets out how the EBRD discloses information and consults with its stakeholders so as to promote better awareness and understanding of its strategies, policies and operations. Hence, this policy mainly defines the EBRD's responsibilities regarding information disclosure.

Article 3.4.1 of the PIP states that *the Bank will make available Environmental and Social Impact Assessments on "Category A" projects in its Business Information Centre in London and in the relevant EBRD Resident Office at least 60 days prior to consideration of the project by the Board of Directors for private sector projects. Notification of the documents' availability will be posted on the EBRD web site.*

3.0 Previous Public Consultation and Disclosure

A Project Description Report (PDR) (a preliminary EIA report) was prepared and submitted to the Balıkesir Provincial Directorate of Environment and Forestry. The project secured an “Environmental Impact Assessment not Required” decision on November 29, 2007, as the development consent. Afterwards an ESIA report was prepared in January 2010 by the project owner. Although no official public participation meeting was required and held within the scope of Turkish EIA Regulation, local meetings and a socio-economic survey were conducted for the proposed Project.

Following sections describe the public participation and consultation meetings and disclosure of information previously conducted for the proposed Project.

3.1 Public Consultation and Disclosure Meeting

During the environmental and social assessment process, a social impact assessment study was conducted. This study included interviews with affected groups collectively or individually, questionnaires and public consultation/participation meetings. A preliminary assessment was carried out to assess the number of properties that may be affected by the Project at each village. Villages were selected according to the amount of expropriation or land acquisition needed and proximity to the project area. As a result, small scale meetings with the affected groups were held in Ayvatlar, Eşeler, Gökçeören, Karakaya, Kürse and Yeniköy villages. Private lands only in Ayvatlar Village were subject to land acquisition due to the Project. Since the number of lands to be acquired in Gökçeören was small, only “muhtar” (village headman) level questionnaires were conducted.

At these meetings, the Project and the associated construction and operation activities were described and explained to the public and questions, opinions, comments and concerns of the public related to the project were gathered. Local people had a positive attitude about the project. It was found out that during public consultation meetings and social impact assessment works, most of the community members were aware where the wind farm, access roads and its associated transmission line would be located due to earlier field studies performed in the area.

During the meetings, the local communities asked for, in majority, the employment opportunities, the improvement of sewage systems, compensation/assistance for some requirement in villages like the common village house, djemevi (pray house), sports arena, the improvement or the construction of village roads to access their lands. The latter was a major issue in Yeniköy since Turkish Highway Authority constructed a double-lane road network and prohibited direct access to their lands.

Questions raised and comments received from the community during these meetings are summarized below:

- What are the employment opportunities?

- Will there be an electromagnetic field when switchyard in operating?
- Would this electromagnetic effect influence nature of our animals? Will there be a change in their breeding capability?
- Are we able to use our lands during operation phase of the project?
- We are happy with the presence of the wind farm here, since we will have a good sight view, especially at night time.
- It would be better if there is a possibility to use an electromagnetic distribution mechanism so that we feel safer.
- We would like to have some improvements to be made in our village such as improvement of village roads, improvement in sewage systems, etc.
- What is the operating life of the wind farm and what will happen at the end of this period?
- How will the land acquisition process continue? Especially for privately owned lands?
- What happens when we are not happy with the current acquisition procedures?
- We want to be notified prior to physical construction activities so that we can be prepared.

The questions and comments given above have been assessed in the ESIA report. During the meetings, name-surname, location, general opinion about the project and signatures of the participants were recorded. A total of 37 people signed the participant list. Among these, 6 people were from Karakaya Village, 8 people from Kürse Village, 6 people from Eşeler Village, 8 people from Ayvatlar Village and 9 people were from Yeniköy Village. Figures 3-1 show some of the meetings that were held as part social impact assessment and public disclosure of the Project.



Meeting in Ayvatlar Village



Meeting in Eşeler Village



Muhtar Consultation in Gökçeören



Meeting in Karakaya Village



Meeting in Kürse Village



Meeting in Yeniköy Village

Figure 3-1 Project Disclosure during Village Meetings

There was no representative of the governmental institutions since these meetings were not required by the Turkish EIA regulation. However, during the evaluation period of the PDR, a number of provincial offices were contacted and the Project received their official approval or consents.

The ESIA report stated that a grievance mechanism was prepared in order to receive potential complaints. AECOM was informed that no complaints had been received from the project activities up to now. In addition, it was committed in the ESIA report that there would be a permanent community relations office at construction site during construction and operation phases of the Project.

There was no resettlement within this Project, only some privately owned lands were affected. AECOM was informed that all the land acquisition procedures were completed within the Project.

4.0 Stakeholder Analysis

Stakeholder identification can be defined as a process to determine who will be directly or indirectly affected, positively or negatively, by a project (commonly called project affected people or groups), and who can contribute to or hinder its success (commonly called other relevant stakeholders). The stakeholder for the Project consists of the affected communities, local landowners, national regulatory authorities, local regulatory authorities, local agencies and non-governmental organizations. These key stakeholders are described in the following sections.

Affected communities

Residential areas that are located in close vicinity to the Project site are as follows (value in parenthesis is the distance of the residential area from the nearest turbine); Yeniköy Village (1750 m to T1), Kürse Village (1400 m to T11), Gökçeören Village (1750 m to T24), Armutlu Village (2300 m to T24), Eşeler Village (415 m to T33), Karakaya Village (1130 m to T45) and Ayvatlar Village (1450 m to T43). There is also Akarsu Village which is close to the energy transmission line. The distance of the Project site from Balıkesir city center is nearly 12 km. Among the affected communities, Eşeler Village is the closest residential area to the proposed Project site and thus it might be affected most from the Project's potential impacts during construction and operation phases, especially noise and visual impacts.

Land owners

The ESIA report states that 67.3% of the Project site is a pasture land, 10.9% is privately owned lands (only in Ayvatlar Village), 10% is forestry lands and 11.8% is unregistered lands. AECOM was informed that all the permits and legal procedures related to the land use were secured and completed for the Project.

Local Agencies

The local municipality will provide domestic solid waste collection and disposal of the domestic wastewater and is a stakeholder of the project. Headmen of Ayvatlar, Eşeler, Gökçeören, Karakaya, Kürse and Yeniköy villages are also local stakeholders.

National and Local Regulatory Authorities

National and local regulatory agencies that are stakeholders of the project are listed in Table 4-1.

Table 4-1 Key National and Local Stakeholder List for the Project

| Stakeholder Organization (SO) Name | SO Responsibilities/Roles in Organizations | Stakeholder Type |
|---|--|--|
| <i>Ministry of Environment and Urbanization</i> | <i>Implementation and enforcement of environmental legislation at the national level.</i> | <i>National Regulatory Authority</i> |
| <i>Ministry of Energy and Natural Resources</i> | <i>Implementation and enforcement of energy legislation at the national level.</i> | <i>National Regulatory Authority</i> |
| <i>Balıkesir Governorship, Balıkesir Provincial Directorate of Environment and Urbanization</i> | <i>Implementation and enforcement of environmental legislation at the local level. Environmental permitting local authority.</i> <i>Environmental Impact Assessment and Planning Branch is the authority for reviewing and assessment of Project Description Files (Preliminary EIAs) and EIAs and it is the Environmental Development Consent Authority.</i> | <i>Local Regulatory Authority</i> |
| <i>General Directorate of State Hydraulic Works (25th Division)</i> | <i>-In case of groundwater use- Implementation and enforcement of legislation related to groundwater use at the local level.</i> <i>All groundwater is owned by the State and DSI manages the groundwater resources in Turkey</i> | <i>Local and Regional Regulatory Authority</i> |
| <i>General Directorate of Forestry, (Balıkesir Provincial Administration)</i> | <i>Implementation and enforcement of legislation related to forestry at the local level.</i> | <i>Local Regulatory Authority</i> |
| <i>Balıkesir Governorship, Provincial Administration of Agriculture</i> | <i>Implementation and enforcement of legislation related to agricultural areas at the local level.</i> | <i>Local Regulatory Authority</i> |
| <i>Balıkesir Special Provincial Administration</i> | <i>Implementation and enforcement of legislation related to health, agriculture, industry and trade; environmental arrangement plan of the province, public works and housing at the provincial level.</i> | <i>Local Regulatory Authority</i> |
| <i>Central and Kepsut District Governorates</i> | <i>Implementation and enforcement of national legislation at local level.</i> | <i>Local Regulatory Authority</i> |

Non-governmental organizations (NGOs)

There are many NGOs at national level that work for the protection of environment. Some of the key national NGOs are listed below:

- Regional Environmental Center (REC);
- World Wild Life Foundation (WWF) Turkey;
- Nature Society;
- The Turkish Foundation for Combating Soil Erosion, for Reforestation and Protection of Natural Habitats (TEMA);
- Turkey Environment Foundation;
- Protection of Turkey's Nature Society; and
- Wild Life Protection Society

Employees/Workers

As required by the PR 10 paragraph 9 of the EBRD's Environmental Policy (2008), employees are also stakeholders of the proposed project. Workers involved in the construction and operation of the project are stakeholders of the project.

Other Relevant Stakeholders

The electricity generated by the project will be connected to the national grid at transformer stations operated by the TEİAŞ. Hence, TEİAŞ is other relevant stakeholder of the project who can contribute to the success of the project.

5.0 Future Stakeholder Engagement

A public consultation and disclosure was conducted during the ESIA phase of the Project.

Stakeholder engagement during project preparation and implementation phases is required by the EBRD Environmental Policy (2008) and is described in PR 10. Future stakeholder engagement according to the EBRD requirements is described in the following parts.

5.1 Consultation

Affected communities and local agencies

The local Governors Office and the headmen of the villages surrounding the Project will be provided with the work schedule for the project construction. If they request it, a schedule may be posted in a prominent place in the communities. In addition, there will be signs along the access roadsides to the Project area. In this way, people can be aware of when construction activities will take place and the nature of these activities. If there are to be significant impacts, such as road blockages or other disturbances, this will be communicated as well. If there are major changes in the schedule, this will also be communicated with the surrounding communities.

Local community will also be informed at key stages in the project cycle, such as before construction commences and prior to start-up of operations.

National and Local Regulatory Authorities

Enerjisa will consult with government authorities at all levels, including meeting legal reporting requirements under various permits and licenses, working with the relevant bodies to deal with unexpected impacts or issues, and working with authorities to help deal with grievances of other issues raised by stakeholders.

Provincial governor's office will serve as a key link between the people and Enerjisa. It will help disseminate information to villages as needed.

Non-governmental organizations (NGOs)

During project implementation phase, NGOs will be informed about the progress in the Project through appropriate disclosure means as described in Section 5.2.

Employees/Workers

Prior to beginning the construction, the foreman will receive a briefing on any relevant issues that were raised in the consultation process to ensure that they are aware of sensitivities that they may encounter. The foremen in turn will ensure that workers are aware of any social or environmental sensitivities within nearby communities. Workers will have a separate engagement

process than the engagement with affected communities. Workers will have a separate grievance mechanism from the public.

5.2 Disclosure of Information

The EBRD requires disclosure of following documents for public review:

- Non-Technical Summary (NTS);
- Stakeholder Engagement Plan (SEP);
- Environmental and Social Action Plan (ESAP); and
- Supplementary Document that are prepared for the Project according to the EBRD requirements.

The hard copies of these documents will be available in local language at the project camp site as well as the villages located around the project site, namely Eşeler Village, Ayvatlar Village, Karakaya Village and Kürse Village. There will be a press release in a local (*Balıkesir Ekspres*) and a national newspaper (*Tercüman*) in October; indicating a notice on the project disclosure; specifying where the additional information can be found, in terms of local and national addresses including the website address.

Hard and electronic copies of the disclosure material will be available for public review at the following addresses:

- Enerjisa Project Site Office
Halit ILGAR, Construction Site Supervisor, Enerjisa
Address: Karakaya-Eşeler Köyü, BALIKESİR
Mobile: +90 530 542 2198
- Eşeler Village Headman Office
İbrahim Eren, Village Headman, Eşeler Village, Balıkesir
- Ayvatlar Village Headman Office
Mustafa Akkeçi, Village Headman, Ayvatlar Village, Balıkesir
- Karakaya Village Headman Office
Rıdvan Özcan, Village Headman, Karakaya Village, Balıkesir
- Kürse Village Headman Office
Mehmet Erdem, Village Headman, Kürse Village, Balıkesir
- Enerjisa
Address: Sabancı Center Kule 2, 34330, 4. Levent / İSTANBUL
Tel: +90 212 385 8825 Fax: +90 212 385 8839
www.enerjisa.com.tr

- **EBRD Office**

Address: One Exchange Square London EC2A 2JN, UK

Tel: +44 20 7338 6747

Fax: +44 20 7338 6155

www.ebrd.com

The EBRD disclosure package will be available for public review after review of the materials by the EBRD. Notification of the documents' availability will be posted on the EBRD web site. The disclosure material and full EIA report will be available for public disclosure at least 60 days prior to consideration of the project by the Board of Directors (as required by the EBRD Public Information Policy, paragraph 3.4.1). The EIA will stay in the public domain throughout the life of the Project. But can be amended, from time to time, with additional information.

Disclosure of information to the administrative stakeholders will be based on formal notifications, applications and reporting – as required by law and ongoing investment process.

Environmental and Social Action Plan, EIA report, annual reports on the Project development, post-construction monitoring results and other Project-related documents will be posted in the web site of the company (<http://www.enerjisa.com.tr>). External stakeholders can access to this information. Public grievance mechanisms are described in Section 7.

Internal stakeholders (Employees/Workers) will be informed using the existing communication channels. The routine communication channels comprise: periodical meetings, announcements, information letters and notifications posted on information boards, trainings, flow of information through the management chain. Workers will have a separate engagement process. Engagement with workers about working conditions, including occupational health and safety, and the workplace relationship will follow the requirements of EBRD's Environmental Policy (2008) PR 2 at a minimum. Workers will have a separate grievance procedure as described in Section 7.

5.3 Timetable

Timetable of the consultation and disclosure activities described in the previous sections are provided in Table 5-1.

Table 5-1 Timetable for Stakeholder Engagement Program

| Activity | Type of Information Disclosed | Form of communication and address | Duration / Dates | Stakeholder Groups consulted |
|--|--|--|---|------------------------------|
| Publication of ESIA Disclosure Package | Non-Technical Summary (NTS), Stakeholder Engagement Plan (SEP), Environmental and Social Action Plan (ESAP) and Supplementary Document | Hard and soft copies will be available at offices and web sites of Enerjisa and the EBRD. Notification of the documents' availability will be posted on the EBRD and Enerjisa web sites. | At least 60 days prior to consideration of the project by the Board of Directors After review of documents by the EBRD | All stakeholders |

| | | | | |
|---------------------------------------|--|---|--|--|
| Monitoring reports | Monitoring report to assess the compliance with statements made in the ESIA report. | Formal monitoring report will be submitted to the EBRD if requested | Once during construction, operation and decommissioning phases of the Project TBD according to actual Project timeline. | |
| Announcement of construction program | Details of proposed construction program including proposed work on local roads and transportation program for major components (road closures). | Formal notification Information board/ announcement in respective communities' buildings | Prior to construction | Affected communities and local and provincial agencies |
| Announcement of start-up of operation | Announcement of start-up of operation | Formal notification Internet – company website. Information board/ announcement in Respective communities' buildings. | TBD according to actual Project timeline. | All stakeholders |
| Employee engagement | Employee engagement process and employee grievance mechanism | Periodical meetings, announcements, information letters and notifications posted on information boards, trainings, flow of information through the management chain, etc. | On-going process | Workers |

6.0 Resources and Responsibilities

Implementation of the SEP is the responsibility of Enerjisa. Enerjisa will designate personnel to handle consultation, disclosure and grievance activities. Enerjisa will react in the fastest possible time to any issues raised by the stakeholders.

Enerjisa will designate a person for the implementation of the SEP. Responsible person's name and contact information will be provided after a person is assigned for this position.

7.0 Grievance Mechanism

7.1 External (Public) Grievance Mechanism

In the scope of the proposed project, a public grievance mechanism will be established and implemented in order to ensure that complaints of the project affected people are considered and resolved with corrective actions in a timely manner. The grievance mechanism will be in a way to address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution.

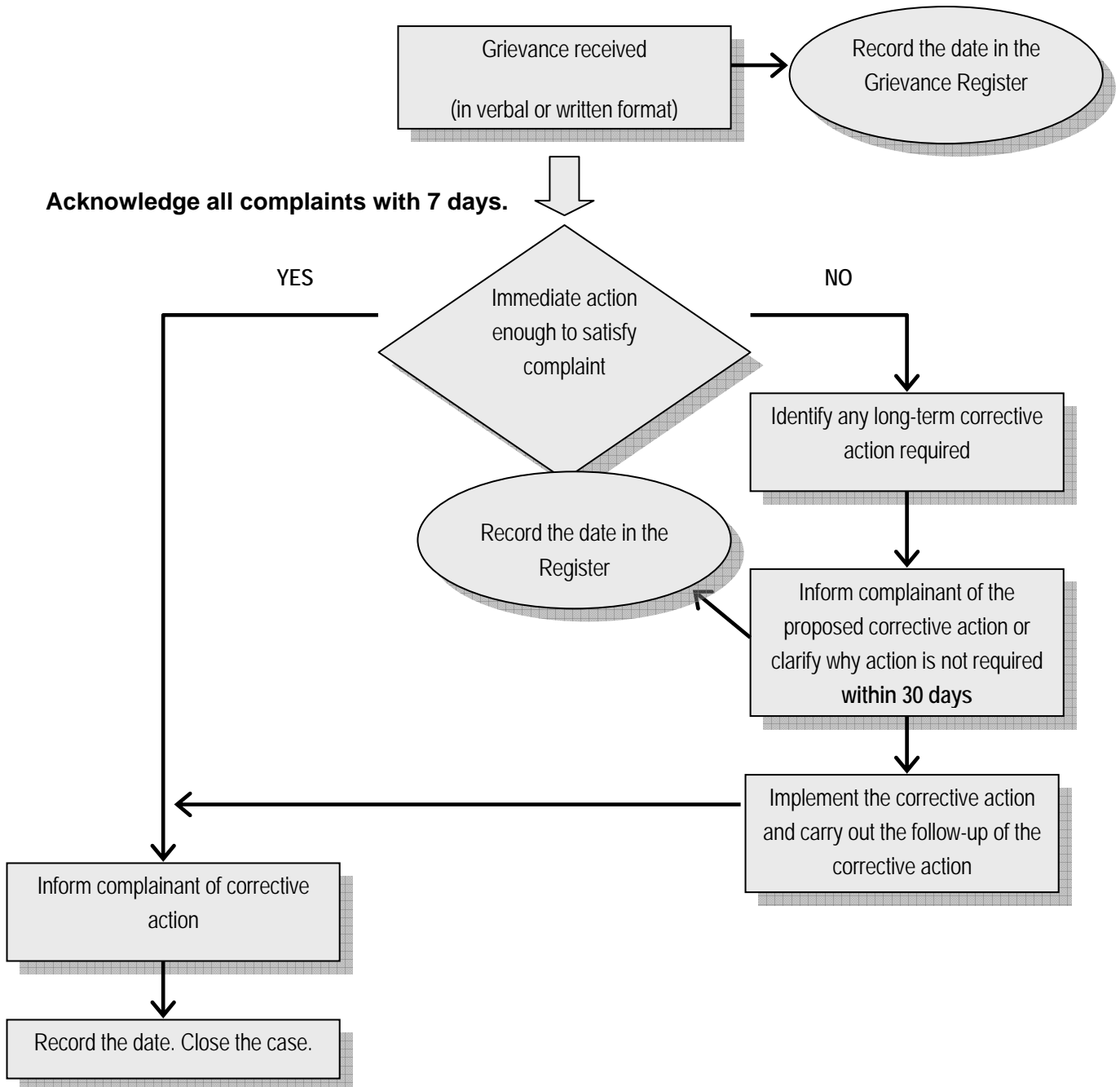
A public grievance mechanism will be established for the Project. Any comments or concerns can be brought to the attention of the company orally or in writing (by post or e-mail) or by filling in a grievance form (see example at end).

All grievances will be put in a register and assigned a number, and acknowledged within 7 days. A response will be provided within 30 days. The basic flowchart of public grievance mechanism is provided below.

7.2 Internal (Worker) Grievance Mechanism

Enerjisa will also have an internal grievance mechanism in order to ensure that complaints of the employees/workers are considered and resolved. Grievance mechanisms for workers will be different from public grievance mechanisms and will be in accordance with PR 2 of EBRD's Environmental Policy (2008).

A worker grievance mechanism will be established for the Project. Details of the internal grievance mechanism will be provided later.

Flowchart for Processing Grievances

Public Grievance Form

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

Signature: _____

Date: _____

Please return this form to: Halit ILGAR, Construction Site Supervisor, Enerjisa,

Address: Karakaya-Eşeler Köyü, BALIKESİR Mobile: +90 530 542 2198

or

Enerjisa

Address: Sabancı Center Kule 2, 34330, 4. Levent / İSTANBUL

Phone: +90-212-385 8825 Fax: +90-212-385 8839

8.0 Monitoring and Reporting

Public consultation and disclosure activities held during scoping and EIA phases of the Project were reported as described in Section 3. Future engagement activities as defined in Section 5 will be monitored and reported. The implementation of the SEP will be monitored and the evaluations will be provided in the annual environmental, health and safety reports submitted to the EBRD as agreed.