



REPORT

Bağlama Wind Power Plant
Stakeholder Engagement Plan

Submitted to:

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ACRONYMS AND ABBREVIATIONS

CLO	Community Liaison Officer
CRF	Complaint Register Form
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESDD	Environmental and Social Due Diligence
EU	European Union
IFC	International Finance Corporation
MoEU	Ministry of Environment and Urbanisation
NGO	Non-Governmental Organization
PAP	Project Affected People
PCDP	Public Consultation and Disclosure Plan
SEP	Stakeholder Engagement Plan
MoLSS	Ministry of Labour and Social Security
WB	World Bank

1.0 PROJECT DESCRIPTION

Fina established the Project Company, namely Ares Elektrik Üretim A.Ş., (“Ares”) for the development of the Bağlama Wind Power Plant (“WPP”). Fina Energy is the sole owner of the Project and aims to secure funding for the Bağlama WPP from potential lenders, as such Golder was recruited to conduct an ESDD of the Project in line with the WP ESSs and current Turkish legislation.

This Stakeholder Engagement Plan (SEP) has been produced to contribute to the studies conducted to assess the Environmental and Social Due Diligence of the Project as per the World Bank (“WB”) Environmental and Social Standards (“ESS”), EBRD Performance Requirements and IFC Performance Standards.

This SEP was prepared by Golder Associates Müh. Müş. Proje İth. İhr. Tic. Ltd. Şti. (Golder) on behalf of Ares prepared for the construction and operational phases of the Project in line with the WB ESS 10 requirements and it is based on an evaluation of the stakeholder engagement program to date. The SEP identifies target groups and the specific range of engagement activities required for each group.

The nearest settlements to the Bağlama WPP Project is Çiğir Neighbourhood with 2 km distance to T7 and Törelî Neighbourhood with 2 km distance to T13. Other nearby settlements around the Project site are Kuşluk, Değirmitaş, Hasbey, Yuva, Yemişlik, Bağlama, Anaköy, Daldere and Söğütlü Neighbourhoods.

ETL having the length of 3079 meters is located within Kuşluk and Yoldöndü Neighbourhoods of Gevaş District in Van Province. The shortest distance of the ETL to Kuşluk Neighbourhood is 1 km.

The Project location is shown in Figure 1.

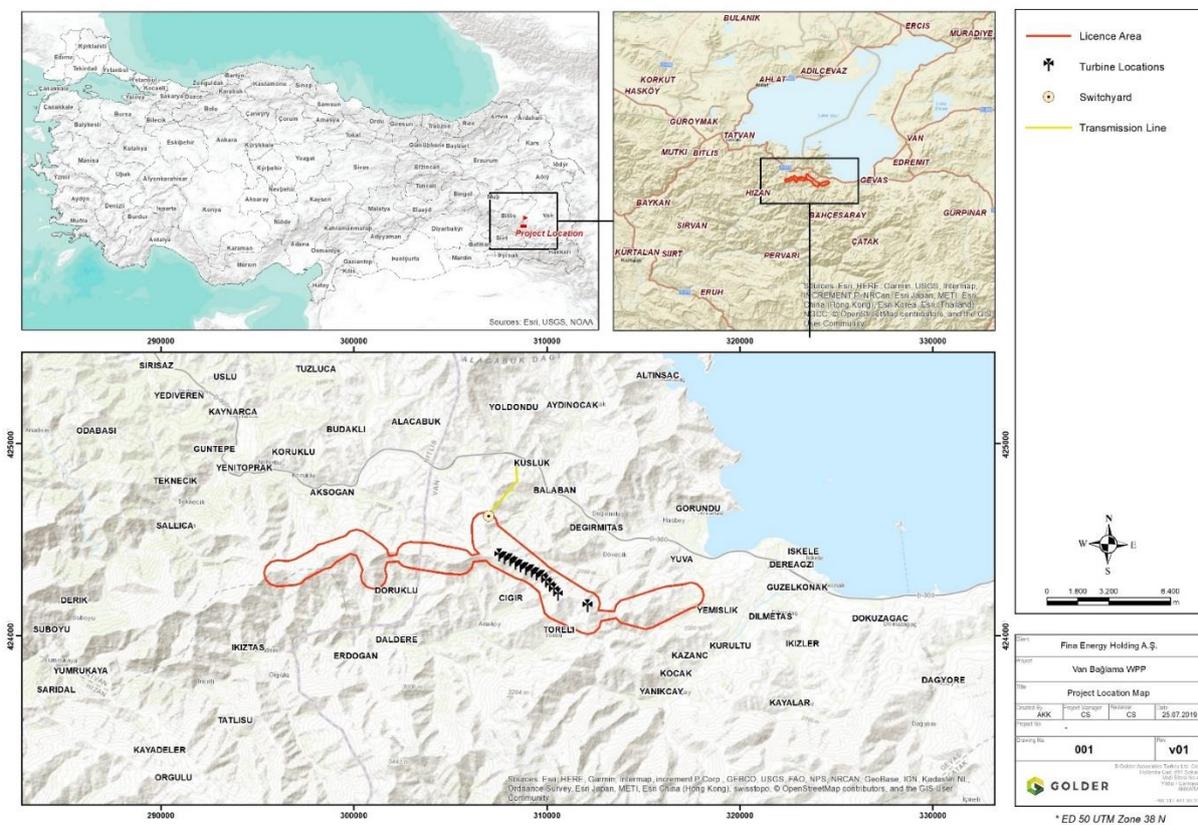


Figure 1 Bağlama WPP Project Site Location Map

2.0 PURPOSE AND SCOPE

The overall objective of the SEP is to explain how the Ares is planning to engage with stakeholders through the course of the Project. The stakeholder engagement is a key activity within projects such as the present one, because it creates an open communication channel with stakeholders, it allows stakeholders to understand significant impacts of the Project and helps the Sponsor address local expectations and incorporate feedback in the project design, overall fostering the achievement of a sound and comprehensive project. SEP presents a plan for consultation designed to:

- Provide timely information about the project and its potential impacts to project affected people (“PAP”) and other stakeholders;
- Provide opportunities to those groups to voice their opinions and concerns in a way that is most appropriate to their circumstances; and
- Provide an opportunity for feedback to, and discussion with, those settlements concerning measures proposed.

The Project is categorised B in terms of World Bank Environmental and Social Risk Categorization. For projects that are likely to have potentially limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; World Bank requires to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project. Relatedly, the overall objectives of this SEP are the following:

- To outline a systematic approach to stakeholder engagement that will help the proponent build and maintain a constructive relationship with stakeholders, directly affected communities;
- To promote improved environmental and social performance of the project through effective and ongoing engagement with the project’s stakeholders;
- To ensure that meaningful information on the project environmental and social impacts are disclosed to the project’s stakeholders;
- To promote and provide a means for accessible, transparent and open engagement with affected communities throughout the project lifecycle on issues that could potentially affect them;
- To ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

According to ESS 1, stakeholder engagement must involve the following elements:

- stakeholder identification and analysis,
- stakeholder engagement planning,
- disclosure of information,
- consultation and participation,
- grievance mechanism, and;
- ongoing reporting to relevant stakeholders.

As the World Bank requires clients to conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely,

relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation; more specific objectives of this SEP include:

- Identifying, mapping and assessing stakeholders and how they may be affected by or interested in the project.
- Ensuring that vulnerable and disadvantaged groups are identified, and reasonable measures are implemented to include them in on-going consultations.

This SEP applies to all activities performed as part of the Project. Moreover, the SEP is a living document that will be updated during the different phases of the Project.

3.0 REGULATORY REQUIREMENTS

A. APPLICABLE TURKISH STANDARDS

THE CONSTITUTION OF THE REPUBLIC OF TURKEY

“The Constitution of the Republic of Turkey” is the main document related to the stakeholder engagement component of the Project. The articles of the Constitution related to engagement issues are listed below:

VII. FREEDOM OF THOUGHT AND OPINION

ARTICLE 25. Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

VIII. FREEDOM OF EXPRESSION AND DISSEMINATION OF THOUGHT

ARTICLE 26. Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

VIII. HEALTH, THE ENVIRONMENT AND HOUSING

A. Health Services and Conservation of the Environment

ARTICLE 56. Everyone has the right to live in a healthy, balanced environment.

It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

XI. CONSERVATION OF HISTORICAL, CULTURAL AND NATURAL WEALTH

ARTICLE 63. The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

VII. RIGHT OF PETITION

ARTICLE 74. Citizens and foreign residents considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly with regard to the requests and complaints concerning themselves or the public.

II. CIVIL LAW

Real property rights and restrictions are defined under the relevant section of Civil Law No. 4721 (Issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project.

III. LAW ON THE RIGHT TO INFORMATION

Law on the Right to Information No. 4982 (Issued on 24.10.2003, Official Gazette No. 25269) regulates the procedure and the basis of the right to information according to the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government. Everyone has the right to information on the activities of public institutions and professional organizations, which qualify as public institutions.

IV. LAW ON THE USE OF RIGHT TO PETITION

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the component authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of the Law on the Use of Right to Petition No. 4982 (Issued on 01.11.1984, Official Gazette No. 3071). Foreign residents have this right considering the principle of reciprocity and by drawing up petitions in Turkish.

V. EXPROPRIATION LAW

Another law related to the involvement of stakeholders to the Project is the Expropriation Law No: 2942 (Issued on 04.11.1983, Official Gazette No. 18215).

The administration action of the expropriation process is performed in line with the Expropriation Law No. 2942 (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorization, procedure, reason and subject of the action.

VI. ENVIRONMENTAL LAW

In addition to the legislation explained above, the fundamental law in Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491). According to Environmental Law, citizens as well as the State bear responsibility for the protection of the environment based on the “polluter pays” and “user pays” principles. The Law is supported by numerous Regulations and decrees prepared or updated in the process of alignment with European Union legislation.

The main stages of the Environmental Impact Assessment are defined by the Turkish Regulation on Environmental Impact Assessment (“EIA”) (25.11.2014, OG No. 29186 amended 09.02.2016, 26.05.2017).

The Projects requiring an Environmental Impact Assessment Report, the EIA process and other relevant principles and procedures are detailed in the Environmental Impact Assessment Regulation. The first Turkish EIA Regulation was put into force in 1993 and it was amended in 1997, 2002 and 2003, 2008 and finally the last EIA Regulation came into force on November 25th, 2014 and its latest amendment occurred on 26.05.2017.

In accordance with Turkish Republic Ministry of Environment and Urbanization Environmental Impact Assessment (“EIA”) Regulation (Official Gazette Nov. 25, 2014; No: 29186), relevant requirements in relation with EIA Process have been disclosed to the public.

Bağlama WPP was initially designed with 25 turbines with the total installed capacity of 50 MW and granted the EIA Positive Decision was granted for the Project on 14th of December 2017. Following the EIA approval, the Project was firstly redesigned to have 15 turbines and total installed capacity of 51,975 MW. Following this, the Project was revised again considering the wind analysis and engineering studies and the final design criteria was set as 53.2 MWm/50 MWe of total installed capacity by installing 14 turbines with 3.8 MW each.

B. APPLICABLE INTERNATIONAL STANDARDS

EBRD PERFORMANCE REQUIREMENTS

EBRD is committed to promote environmentally sound and sustainable development in accordance with its Environmental and Social Policy (May 2014) and the Performance Requirement (PR) 10: Information Disclosure

and Stakeholder Engagement. EBRD sets out their stakeholder engagement requirements in the following documents:

- Environment and Social Policy (2014) and PR 10 Information Disclosure and Stakeholder Engagement (2014)
- Public Information Policy (2014)¹

EBRD considers public consultation and stakeholder engagement and the disclosure of information as an on-going, meaningful and inclusive process, to be started at the earliest stage of the environmental and social assessment process and to be continued throughout the entire life of the EBRD financed project.

WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARDS

World Bank Environmental and Social Standards articulates the Corporation's strategic commitment to sustainable development. ESSs establish standards that the client is to meet throughout the life of an investment, applicable standards guiding social studies are as follows:

- ESS1 Assessment and Management of Environmental and Social Risks and Impacts,

In response to stakeholder engagement, ESS1 requires the client to develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage, and be tailored to the characteristics and interests of the Affected Communities. The Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. When the stakeholder engagement process depends substantially on community representatives, the client will make every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents. This SEP is also a documentation responding to the requirement for stakeholder engagement and information disclosure of WB ESS.

ESS1 in specific, requires

- To identify and evaluate environmental and social risks and impacts of the project.
 - To adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual impacts remain, compensate/offset for risks and impacts to workers, Affected Communities, and the environment.
 - To promote improved environmental and social performance of clients through the effective use of management systems.
 - To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
 - To promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated.
- ESS2 Labor and Working Conditions
 - ESS4 Community Health and Safety
 - ESS8 Cultural Heritage

¹ <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

■ ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts

EQUATOR PRINCIPLES

The Equator Principles (EPs) is a voluntary financial industry benchmark for determining, assessing and managing social and environmental risks in project financing.

The EPs are considered the financial industry 'gold standard' for sustainable project finance. The EPs, based on the International Finance Corporation (IFC) performance standards on social and environmental sustainability, and on the World Bank Group's Environmental, Health and Safety general guidelines, and are intended to serve as a common baseline and framework for the implementation by each adopting institution of its own internal social and environmental policies, procedures and standards related to its project financing activities.

Equator Principles Financial Institutions (EPFI) commit to not providing loans to projects where the borrower will not or is unable to comply with their social and environmental policies and procedures that implement the EPs.

Ares should be committed to comply with the Equator Principles, which are the following:

- Principle 1: Review and Categorisation
- Principle 2: Environmental and Social Assessment
- Principle 3: Applicable Environmental and Social Standards
- Principle 4: Environmental and Social Management System and Equator Principles Action Plan
- **Principle 5: Stakeholder Engagement**
- **Principle 6: Grievance Mechanism**
- Principle 7: Independent Review
- Principle 8: Covenants
- Principle 9: Independent Monitoring and Reporting
- Principle 10: Reporting and Transparency

Principle 5 in specific sets out that, *"For all Category A and Category B Projects, the EPFI will require the client to demonstrate effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and, where relevant, Other Stakeholders. For Projects with potentially significant adverse impacts on Affected Communities, the client will conduct an Informed Consultation and Participation process. The client will tailor its consultation process to the risks and impacts of the Project; the Project's phase of development; the language preferences of the Affected Communities; their decision-making processes; and the needs of disadvantaged and vulnerable groups. This process should be free from external manipulation, interference, coercion and intimidation.*

To facilitate Stakeholder Engagement, the client will, commensurate to the Project's risks and impacts, make the appropriate Assessment Documentation readily available to the Affected Communities, and where relevant Other Stakeholders, in the local language and in a culturally appropriate manner.

The client will take account of, and document, the results of the Stakeholder Engagement process, including any actions agreed resulting from such process. For Projects with environmental or social risks and adverse impacts, disclosure should occur early in the Assessment process, in any event before the Project construction commences, and on an ongoing basis.”²

Principle 6 in specific sets out that “For all Category A and, as appropriate, Category B Projects, the EPFI will require the client, as part of the ESMS, to establish a grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance. The grievance mechanism is required to be scaled to the risks and impacts of the Project and have Affected Communities as its primary user. It will seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the Affected Communities about the mechanism in the course of the Stakeholder Engagement process.”

EUROPEAN COMMISSION

While Turkey is not bound by European legislation, Ares will seek to develop stakeholder engagement in compliance with EU environmental policy.

ESDD is a key instrument of EU environmental policy. Since the inception of the first EIA Directive in 1985 (Directive 85/337/EEC) both the law and the practice of EIA have evolved. An amending Directive was published in 1997 (Directive 97/11/EC).

The primary aspects related to stakeholder engagement are linked to the EIA Directive (85/337/EEC), which includes amendments that align with the Aarhus Convention on Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).

The Aarhus Convention focuses on three key areas:

Access to information: ensures that the public can have a system whereby one can request and receive information, thus allowing for informed participation;

Public participation; provides for public participation early in decision-making on activities that can have significant environmental impact; and

Access to justice: ensures that the public has legal mechanisms available to review potential violations of access to information and public participation provisions.

4.0 SUMMARY OF EXPECTED SOCIAL IMPACTS IN GENERAL

The project is likely to have different types (negative/positive) and levels of different impacts (negligible/minor/major) on different terms:

- Population impacts,
- Socio-economic impacts,
- Individual and family level impacts,

² <https://equator-principles.com/>

- Public health, safety and security impacts,
- Community infrastructure (e.g. water, electricity, communication, transportation, housing) due to vibration, traffic, excavation works, etc.
- Land acquisition impacts,
- Effects on intangible cultural heritage,
- Intrusion impacts, including noise pollution, light pollution, visual pollution, air pollution and odor,
- Influx management and labor influx impacts,
- Cumulative impacts.

This SEP should be updated with specific mitigation measures taking into consideration of these and additional impacts in pre-construction, construction, operation, closure and decommissioning phases of the Project.

5.0 STAKEHOLDER IDENTIFICATION

A stakeholder is any entity with a declared or conceivable interest or stake in a concern/project/activity. The range of stakeholders relevant to consider for analysis varies according to the complexity of the area targeted and the type proposed and, where the stakeholders are not organized, the incentive to include them. Stakeholders can be of any form, size and capacity. They can be individuals, organizations, or unorganized groups. In most cases, stakeholders fall into one or more of the following categories: International actors, national or political actors, public sector agencies, interest groups, commercial/private for-profit, non-profit organizations (NGOs, foundations), civil society members, and project affected people.

All International Financial Institutions (“IFIs”) require that stakeholders who may be affected by a project must be consulted. Stakeholders also include people who may not be directly affected, and other groups who may possess information and resources that can benefit the project.

Four major attributes are important for Stakeholder Analysis: The stakeholders’ position on the issue, the level of influence (power) they hold, the level of interest they have and the group/coalition to which they belong or can reasonably be associated with³.

A key objective of the stakeholder analysis is to clearly identify those who may be adversely affected by project impacts, or unfairly excluded from project benefits. This should be done with a particular emphasis on vulnerable groups to ensure that they are not disproportionately affected, and that any adverse impacts are avoided or mitigated.

There are two key steps to identifying stakeholders for consultation purposes:

- I. Identify relevant stakeholder categories; and
- II. Within each stakeholder category, determine who to engage with and how.

Stakeholders of Bağlama Wind Power Project can be roughly categorized as follows, which will be detailed in the following section:

- Adversely affected persons and groups
- Intended beneficiaries

³ <http://www1.worldbank.org/publicsector/anticorrupt/PoliticalEconomy/PDFVersion.pdf>

- Project workers and their representatives
- Implementing agency staff and their consultants
- Other government agencies contributing to the project (e.g. land acquisition authority, extension services that can collaborate with the project, etc.)
- Government policymakers and local authorities
- Civil society (local and international NGOs, community-based organizations, religious groups, media, etc.)
- Academia and research organizations
- Organized interest groups (business association, trade unions, others)
- Relevant private sector companies operating in the project area, or expected to play a role in the project
- Financing institutions, such as the World Bank

6.0 COMMUNICATION METHODS

Communication methods to be employed vary dependant on the project phase, issue to consult/inform as well as the stakeholder type. Communication methods with stakeholders within the Project include but not limited with the following:

- Public hearings or meetings
- Workshops and seminars
- Consultations with key informants
- Focus groups
- Round tables
- Discussions as part of conducting surveys or census studies
- Consultations using electronic media
- Awareness campaigns and outreach
- Internal/external grievance mechanism

Communication methods suggested for Bağlama Project is presented below:

Table 1: Communication Process with Stakeholders

Stakeholders	Communication method	Information to be disclosed	Timeframe
Yoldöndü, Bağlama, Kuşluk, Anaköy, Daldere, Törel, Söğütlü village residents and informal land users Yoldöndü, Bağlama, Kuşluk, Anaköy,	Information boards with post boxes, personal visits to village/town halls municipalities/governorates, Mayor's office, Mukhtar's office, external grievance mechanism, documents on	Non-technical Summary of Project (NTS), grievance mechanism, EIA not required decision or any EIA and supplementary	Prior to construction as well as during project implementation Update on grievances and vacancies periodically.

Daldere, Törelı, Söğütlü village vulnerable groups (By definition; single and child headed households, young unemployed, poor, elderly and the handicapped)	request in nearest local library to the project	information if required. Timeline for construction, EHS performance data.	Prior to commissioning of any new or changes to existing processes.
Gevaş Gendarmerie Commandorship	Face to face interaction, daily information sharing, external grievance mechanism	Timeline for construction, EHS performance data, safety and security updates	Prior to construction as well as during project implementation Annual update on grievances and on vacancies. Prior to commissioning of any new or changes to existing processes.
Yoldöndü, Bağlama, Kuşluk, Anaköy, Daldere, Törelı and Söğütlü village Mukhtars	Information boards with post boxes, personal visits to village/town halls municipalities/governorates, Mayor's office, Mukhtar's office, external grievance mechanism	Non-technical Summary of Project (NTS), grievance mechanism, EIA not required decision or any EIA and supplementary information if required. Timeline for construction, EHS performance data.	Prior to construction as well as during project implementation Update on grievances and vacancies as required. Prior to commissioning of any new or changes to existing processes.
Analysts, Shareholders, Investors	Investor conferences, face-to-face meetings at the Head Office, responding to information requests received by phone or email, teleconferences, analyst meetings, senior management meetings	Annual report, company presentations, profit announcement, disclosure announcements, material disclosure announcements	Annual
Local NGOs	Telephone, newspaper, documents and meetings upon request	Detailed project information on NTS upon request	As required

Village area and district councils	Meetings, telephone, e-mail, information boards in council buildings	EIA not required decision or any EIA and supplementary information if required. NTS, vacancies	As required
Trade unions (Enerji-İş and other related unions)	Face-to-face evaluations, collective bargaining, joint projects, General Assembly, open employer meetings	Timeline for construction, EHS performance data, vacancies	As required
Universities	Conferences, trainings	Technical information sharing	As required
Workers	Information boards and meetings, informative e-mails, internal grievance mechanism, employee satisfaction and loyalty surveys, online idea collection platform, intranet (if any), internal communication events, announcements, committee meetings, trade publications, joint projects	NTS, health and safety requirements, workers protection requirements, workers' grievance mechanism	On-going basis
Suppliers of goods and services	Project site offices, office visits, internet, supplier portal (if any), audits, joint projects, conferences, seminars, corporate memberships	NTS, tender documentation and results, contractor selection process, procurement requirements with EHS and workers protection requirements, grievance mechanism	as required
Emergency department of each village, town and district municipality/governate	Formal e-mails, meetings and telephone calls with the relevant department	EIA (if required), Emergency Preparedness and Response Plan	Prior to construction of new processes or upgrades to existing processes During operation Feedback after an emergency

TEIAS	Formal e-mails	NTS, EIA (where required) and supplements	As required
Stakeholders on cultural and natural heritage; <u>Regional:</u> Ministry of Environment and Urban Planning Directorate General for Preservation of Natural Heritage <u>Local:</u> Bitlis Governorship Provincial Directorate of Culture and Tourism Van General Directorate of Cultural and Natural Heritage	Formal e-mails, phone calls, face to face meeting	NTS, EIA (where required) and supplements, chance find results official information sharing	As required
International NGOs	No direct contact, documents available on Fina Energy website	NTS	For the loan duration
Regional mass media	No direct contact, telephone and e-mails if required	Detailed project information and NTS upon request	As required

Key points to cover during public consultation events should include⁴:

- Explaining objectives of the discussion, how the event will be structured, and expected follow up.
- Agreement on an agenda for the discussion. In some circumstances, particularly where there are low levels of trust, a formal protocol may need to be agreed on before real discussions can take place.
- Summarizing the information about the project that people have been provided prior to the consultation event.
- Managing expectations and be clear about what role the consultations play in decision making.
- Ensuring that at a minimum, the discussion covers people's perceptions and expectations about project benefits and potential adverse impacts; how adverse impacts may be avoided or minimized; what the

⁴ Inter-American Development Bank, Meaningful Stakeholder Consultation (2017).

appropriate mitigation mechanisms may be; and what people consider to be appropriate institutional and organizational mechanisms.

- Provision of sufficient time for people to express their views. Considering holding follow up discussions if needed.
- Selection of facilitators on the basis of their ability to listen, explain, and be empathetic. When possible, having facilitators who are known and trusted locally.
- Summarizing points made and how follow up actions and feedback will be taking place.
- Explaining how people can communicate with the project, and what their right to remedy is if the project fails to meet its obligations or is perceived to cause harm.

7.0 GRIEVANCE MECHANISM

According to IFC Good Practice Note, it defines concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, implementation a grievance mechanism to receive and facilitate resolution of such concerns and grievances. Grievance mechanism should be an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion, and facilitates resolution of concerns and grievances arising in connection with a project. An effective grievance mechanism provides project-affected parties with redress and helps address issues at an early stage..

In principle, the Grievance Mechanism (“GRM”) should serve four purposes:

- I. It should inform decision making related to project design and development, which means it needs to be part of a project management system;
- II. It should serve as a mechanism for timely resolution of an issue and prevent escalation of problems into social conflict;
- III. It should be an accountability mechanism, where people can seek remedy when needed; and
- IV. It should be embedded in a project’s monitoring and evaluation process and contribute to institutional learning.

Therefore, a good working grievance mechanism should be proportionated, culturally appropriate, accessible, transparent and accountable, protected appropriately.

Steps of a grievance system management is suggested below:

Step 1: Publicize Grievance Management Procedures

Step 2: Receive and Keep Track of Grievances

Step 3: Review and Investigate Grievances

Step 4: Develop Resolution Options and Prepare a Response

Step 5: Monitor, Report, and Evaluate the Grievance Mechanism

Summary of the grievance resolution procedure is suggested to be conducted as below.

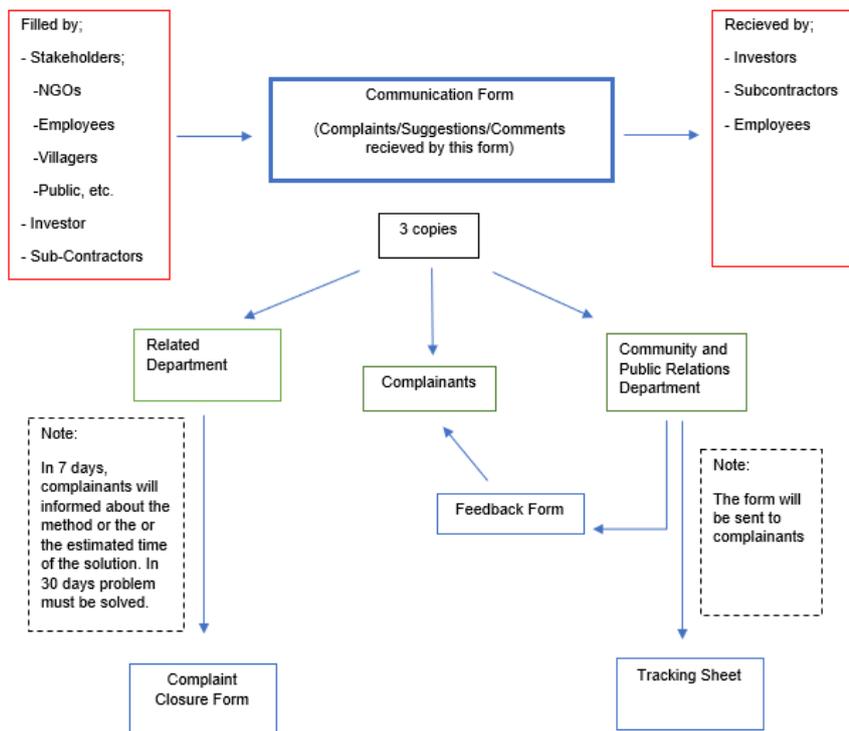


Figure 2: Grievance Resolution Process

8.0 MONITORING AND REPORTING

Internal/external grievances collected and solved, as well as the stakeholder engagement should be recorded and monitored. Therefore, monitoring indicators are determined as follows:

Table 2: Key Monitoring Measures

No	Topic/ Aspects	Methods	Responsible Parties	Frequency
SEP-01	Community Grievances	Community Liaison Officer (“CLO”) and HSE Manager (who can also act as a CLO) will keep the record of the complaints/suggestions in the Grievance Database with details (raised by who, the date, status (open or closed) etc.).	CLO or HSE Manager	ongoing
SEP-02	Engagement activities for both community and local authorities	CLO or HSE Manager will record all formal and informal engagement activities with local communities and authorities in Stakeholder Management System. This will include interactions with committees and working groups. These interactions will be include in the	CLO or HSE Manager	Bi-annually

No	Topic/ Aspects	Methods	Responsible Parties	Frequency
		<p>stakeholder engagement plan by updating the engagement activities.</p> <p>Ares will ensure that an internal audit will be conducted related to stakeholder Engagement process in every 6 months (bi-annually) by Operation Manager or Management representative or designated other responsible (like internal auditors in the company or external third-party companies).</p>		
SEP-03	Disclosure materials disseminated	CLO or HSE Manager will keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement report*.	CLO or HSE Manager	As required
SEP-04	Corporate Social Responsibility Program	CLO or HESE Manager will monitor and record the social responsibility activities carried out in the scope of Project (such as sustainable development projects, in kind and in cash support, infrastructure improvement activities, etc.) and these records will be inserted to stakeholder engagement report*.	CLO or HSE Manager	As required

*SEP is a live document and will be upgraded as required within life-cycle of the project.

Records will be kept on the following subjects:

- 1) Consultation meetings,
- 2) Stakeholder engagement activities,
- 3) Grievances (both internal and external) raised and actions taken to close them,
- 4) Opinions/suggestions/comments provided by the community members during consultation meetings and stakeholder engagement activities (to be recorded in the grievance mechanism),
- 5) Press releases and interviews,
- 6) Records of audits, inspections and incidents.

Examples of grievance log and stakeholder engagement log is presented in appendices C and D.

9.0 ROLES AND RESPONSIBILITIES

Suggested distribution of roles and responsibilities concerning stakeholder engagement between the Project personnel are elaborated below:

Table 3: Roles and Responsibilities

Roles	Description and Responsibilities
Operation/Project Manager	<p>Operation/Project Manager is responsible for:</p> <ul style="list-style-type: none"> ■ Monitoring the correct and effective implementation of this SEP; ■ Inspecting the effectiveness of the environmental, social and HS documents and applications, and the efficiency and effectiveness of the personnel that are appointed for these issues; ■ Managing the labor force, enhancing working conditions, providing resources for personnel training and ensuring that performance assessments are being conducted; ■ Monitoring that Public Relations team is managing the process in the prescribed manner,
Site HSE Specialist/ Manager*	<p>The responsibilities of the HSE Manager are as follows:</p> <ul style="list-style-type: none"> ■ Determines the national and international legislations that are applicable to the Project activities and informs the Operation/Project Manager; ■ Determines the environmental and social impacts and OHS hazards in accordance with the actions, potential mitigation measures, and measures to eliminate any potential social grievances; ■ Ensures that are provisions in the contractor engagements regarding environment, social and HS requirements, as per the Project Standards, during the construction stage, and to audit the performance of said contractors; ■ Determines and provides the necessary training materials for employees; ■ Provides answers to the OHS, environmental and social grievances raised by employees, the local community and local institutions; and ■ Audits the results of the grievance mechanism to each grievance.
Project Social Officer/ Community Liaison Officer	<p>Community Liaison Officer is responsible for:</p> <ul style="list-style-type: none"> ■ Keeping the record of the grievances in the Grievance Database with details (raised by who, date, status (open, awaiting or closed) etc.); ■ Supporting HSE Manager on the first evaluation of the relevance of grievances collected, ■ Ensure all complainants are informed within one week and complaints are resolved within one month; ■ Provide regular reporting back to the community on community grievances, ■ Record all formal and informal engagement activities with local communities in Stakeholder Management System. This will include interactions with committees and working groups. These interactions will be summarized in the stakeholder engagement report, ■ Keep records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement report;

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> ■ Monitor and record the social responsibility activities carried out in the scope of the Project and these records will be inserted to stakeholder engagement report; ■ Organizing quarterly stakeholder meetings to collect the responses to grievances actively; <p>Regular feedback to the stakeholders about the result of their grievances through Closing Form within 30 calendar days (Complainants who have provided their names and contact info will be notified within 7 days that the grievance solution process has started).</p>
Contractors/Subcontractor	<p>Contractors/Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence; and they will follow the rules listed in this SEP and other relevant Management System documentation of Ares. Contractors are responsible with creating their own grievance mechanism and reporting to Ares.</p>

*HSE Manager can act as a community liaison officer.

10.0 LIABILITIES

Ares will be liable from planning and managing stakeholder engagement and shall be available from the following contact information. All stakeholders are invited to review and provide feedback on this SEP to Ares, using the following contacts:

<p>Istanbul office;</p> <p>Name:</p> <p>Title:</p> <p>Telephone:</p> <p>Address:</p> <p>E-mail:</p> <p>Website:</p>	<p>Van office;</p> <p>Name:</p> <p>Title:</p> <p>Telephone:</p> <p>Address:</p> <p>E-mail:</p> <p>Website:</p>
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REFERENCES

- Equator Principles (2013), <https://equator-principles.com/>
- European Bank for Reconstruction and Development, Environmental and Social Policy (ESP) <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>
- Inter-American Development Bank, Meaningful Stakeholder Consultation (2017)
- International Finance Corporation, Performance Standards (2012) https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards

- What is Stakeholder Analysis,
<http://www1.worldbank.org/publicsector/anticorrupt/PoliticalEconomy/PDFVersion.pdf>
- World Bank Environmental and Social Standards, <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards>

APPENDIX A

Internal Grievance Form

INTERNAL GRIEVANCE FORM

Reference No:	
Full Name Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	Name & Surname: _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information How the complainant wants to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Mailing address: _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____ <input type="checkbox"/> I don't want to be contacted
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Case summary:	
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 (Provide details)
What would you like to see happen to resolve the problem?	

Only for internal usage: Status of complaint		
	Date:	Signature:
Complaint is closed by:		
Actions taken (Provide details):		

APPENDIX B

External Grievance Form

EXTERNAL GRIEVANCE FORM

Information about the complainant		
Name and Surname:	Only for internal use: How is the complaint made? 1. In person 2. By phone 3. By mail 4. By e-mail 5. Other (specify).....	
Date: ___/___/_____		
Address		
Phone		
E-mail		
Name and Surname of the person taking the complaint	Date of complaint and signature:	
DETAILS OF COMPLAINT:		
<ul style="list-style-type: none"> • Case for one time (date of problem/complaint • Does the problem occur more than one? <ul style="list-style-type: none"> <input type="checkbox"/> Yes, (how many times?.....) <input type="checkbox"/> No • Does the problem/complaint continue? (If “Yes”, provide details): 		
Only for internal usage: Record and Respond		
Complaint reference number:	Date of complaint log:	
Name of personnel recording the complaint	Copy transfer: • Relevant unit • Other (specify).....	
Required action:		
Only for internal usage: Status of compliant		
	Date:	Signature:
Complaint is closed by:		

APPENDIX C

Grievance Log

APPENDIX D

**Stakeholder Engagement
Register**

Stakeholder Engagement Activities Register

ID number	Type	Date	Location	Title of the meeting
1.	Public consultation meeting			
2.	Project development meeting			
3.	Meeting with local authorities			
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
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19.				
20.				
21.				
22.				
23.				
24.				
25.				

APPENDIX E

Media Search

HEADLINE	SOURCE
Public Consultation Meeting invitation for Baplama Wind Farm Project, to be conducted on 20.01.2017 at 14:00	https://www.ilan.gov.tr/detay-tebligat-kurumsal-tebligat-ve-duyurular-halkin-katilimi-ced-toplantisi-239144.html
Bağlama Project from Ares Electricity	http://www.yatirimlar.com/haber-Ares-Elektrik-Baglama-RES-Projesi-236477.htm
Ares will conduct 50 MW of WPP in Van	https://www.enerjigunlugu.net/ares-elektrik-vana-50-mwlik-res-kuracak-21049h.htm

Signature Page

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