



Uluborlu Solar Power Plant Project

Environmental and Social Due
Diligence

PREPARED FOR



Kavram Enerji Yatırım Üretim ve
Ticaret A.Ş.

DATE

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REFERENCE

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Uluborlu Solar Power Plant Project

Environmental and Social Due Diligence

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AoI	Area of Influence

BMP	Biodiversity Management Plan
Client	Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş.
CHA	Critical Habitat Assessment
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
FI	Financial Intermediaries
GHG	Greenhouse gas
HS	Health and Safety
ILO	International Labour Organization
LRP	Livelihood Restoration Plan
PAP	Project Affected Person
PBF	Priority Biodiversity Features
PRs	Performance Requirements
RAP	Resettlement Action Plan
SCMS	Supply Chain Management System
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SLIP	Supplementary Information Package
SPP	Solar Power Plant
UN	United Nations
WPP	Wind Power Plant

EXECUTIVE SUMMARY

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. ("Kavram" or "the Client"), a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş. ("Fiba") is in the stages of planning the development and operation of the Uluborlu Solar Power Plant ("SPP" or "the Project") located in Isparta Province, Türkiye.

This hybrid project is designed with a total installed capacity of 54.9 MWm / 54.9 Mwe and is located adjacent to the existing Uluborlu Wind Power Plant ("WPP") operated by the Client.

Tegnatia Enerji Üretim San. ve Tic. A.Ş. has been appointed by the Client as the Engineering, Procurement, and Construction (EPC) Contractor, while Alfa Solar Enerji ve Sanayi Ticaret A.Ş. is designated as the primary panel suppliers by the EPC.

For financing, the Client aims to pursue a Project Finance structure involving the European Bank for Reconstruction and Development (EBRD). Compliance with the EBRD Environmental and Social Policy, 2019 and EBRD Performance Requirements (PRs) is mandatory for projects receiving funding from the EBRD.

To adhere to EBRD PRs, the Client engaged Environmental Resources Management (ERM) to conduct an Environmental and Social Due Diligence (ESDD), including a Supply Chain Due Diligence study for the Project. This aims to identify key environmental and social (E&S) sensitivities and ensure the Project's alignment with the EBRD PRs.

ERM's ESDD has revealed some key E&S findings and identified gaps as presented below, leading to the preparation of the Project Environmental and Social Action Plan (ESAP). ESAP outlines further actions to be undertaken by responsible parties, including timelines and indicators of completion.

In response to the ESAP, the Client has appointed ERM to support the fulfillment of identified gaps. ERM will conduct additional studies to address these gaps, and the findings will be presented in a standalone Supplementary Lenders Information Package (SLIP).

THE KEY FINDINGS

- **Environmental and Social Impact Assessment (ESIA):** The Client has developed an Environmental Impact Assessment (EIA) as per Turkish National Requirements. Nonetheless, no social baseline data collection nor a Social Impact Assessment (SIA) have been developed for the Project. This is one of the primary gaps between existing Project assessments/data and EBRD requirements.

However, in February 2024 the Client engaged ERM to begin collecting additional baseline data in order to bridge this gap. The additional scope of work will include social baseline data to assess potential Project impacts to the socio-economic environment, along with additional environmental and biodiversity baseline data. The Client shall also adjust their organizational capacities to ensure that the Project has the appropriate team and resources to assess, manage, prevent, mitigate, and monitor the Project's overall social performance.

- **Stakeholder Engagement and Grievance Mechanism:** The Client did disclose the EIA to the public in a Public Participation Meeting on 15.02.2022, as required by Turkish EIA law. However, other engagement and consultations with stakeholders or the identification of Project-Affected-Persons (PAPs) has not been conducted to date. Thus, there is a gap relative to PR10, and PR5, as engagement with local stakeholders and affected persons is required as early on as possible, especially if any land acquisition and physical and/or economic displacement is foreseen for the Project.

An updated and comprehensive Stakeholder Engagement Plan (SEP) including a Grievance Mechanism (GM) that has provisions to submit, manage, and address both workforce and community grievances is currently being developed. It is recommended that a Community Liaison Officer (CLO) is appointed to specifically manage and carry out stakeholder engagement, implement the SEP, and be responsible for the operation of the GM.

The findings from the development of the social baseline, SIA and potentially relevant inputs from the Livelihood Restoration Plan (LRP) will also be considered in the full SEP. More specifically, the following aspects of the SEP must be adjusted after the inputs from the social baseline, SIA, additional findings from the resettlement expert, and relevant changes in organizational capacities:

- Stakeholder Identification, Mapping and Analysis;
- SEP Roles and Responsibilities;
- Stakeholder Engagement Action Plan; and
- Timelines.

- **Land Acquisition and Resettlement:** While the Client has adhered to Turkish national requirements pertaining to land acquisition and resettlement for the Project the Client does not yet meet the requirements as per PR5. More specifically, the Client has achieved a Public Interest Decision from local government authorities to proceed with land expropriation, the assessment of livelihood and land-related impacts to the local community has not been properly investigated or assessed. Stakeholders were also not consulted on nor informed about these matters. Engagements with stakeholders shall be conducted to develop a de factor understanding of the potentially adverse impacts to livelihoods and local land users/owners.

The Client shall carry out further assessments of the land use, livelihoods, and assess the potential for resettlement of displacement – whether it is economic or physically, and indirect or direct – in line with EBRD PR5. Based on Turkish law it appears there will be no physical resettlement nor displacement, however, based EBRD PR5 it does appear that there will be need for the livelihood restoration.

A Livelihood Restoration Plan (LRP) will be developed following the Livelihood Restoration Process happening in 2024. The Client was engaged with ERM to conduct field survey for livelihood restoration plan.

- **Supply Chain Management:** As part of the due diligence a human rights risk assessment connected to the Project's solar supply chain was commissioned. The assessment concluded that, due to the lack of evidence of effective management systems by EPC Contractor and Primary Supplier, the exposure to human rights risk in the supply chain remains.

The Client currently has no organizational capacity to manage social risks in the supply chain and no systematic supply chain management system (SCMS) is in place to identify, mitigate and remediate human rights risks and impacts in the supply chain.

Some policies and procedures for managing supply chain risks are in place and have recently been updated and/or developed. The Client shall adopt and implement an effective SCMS to identify and manage potential adverse impacts in the Project's solar supply chain, including those related to labour conditions.

- **Project Monitoring and Reporting:** The Client should adopt a project specific Environmental and Social Management System including sub E&S management plans, procedures.

Project documents do not include plans for monitoring and reporting of the environmental and social risks and impacts and their management over the Project's lifetime or monitoring and reporting measures for physical, biodiversity and social components including stakeholder engagement activities.

1. INTRODUCTION

1.1 BACKGROUND AND OBJECTIVES

Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. ("Kavram" or "the Client"), a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş. ("Fiba") is in the stages of planning the development and operation of the Uluborlu Solar Power Plant ("SPP" or "the Project") situated in Isparta Province, Türkiye.

This hybrid project is designed with a total installed capacity of 54.9 MWm / 54.9 Mwe and is located adjacent to the existing Uluborlu Wind Power Plant ("WPP") operated by the Client.

Tegnatia Enerji Üretim San. ve Tic. A.Ş. has been appointed by the Client as the Engineering, Procurement, and Construction (EPC) Contractor, while Alfa Solar Enerji ve Sanayi Ticaret A.Ş. is designated as the primary panel suppliers by the EPC.

For financing, the Client aims to pursue a Project Finance structure involving the European Bank for Reconstruction and Development (EBRD). Compliance with the EBRD Environmental and Social Policy, 2019 and EBRD Performance Requirements (PRs) is mandatory for projects receiving funding from the EBRD.

To adhere to these requirements, the Client has engaged Environmental Resources Management (ERM) to conduct an Environmental and Social Due Diligence (ESDD), including a Supply Chain Due Diligence study for the Project. This aims to identify key environmental and social (E&S) sensitivities and ensure the Project's alignment with the EBRD PRs.

The ESDD is based on the review of local Environmental Impact Assessment ("EIA") report developed by a local consultant, site visit findings, discussions with Client and review of the other Project documents provided by the Client

1.2 APPLICABLE STANDARDS

This ESDD is aligned with Turkish national Environmental and Social Regulations, such as the Constitution of the Republic of Türkiye and Regulation on Environmental Impact Assessment, the European Bank of Reconstruction and Development, (EBRD) Environmental and Social Policy, 2019. EBRD Performance Requirements applicable to this review are as follows:

- EBRD PR1: Assessment and Management of Environmental and Social Risks and Impacts;
- EBRD PR2: Labour and Working Conditions;
- EBRD PR3: Resource Efficiency and Pollution Prevention and Control;
- EBRD PR4: Health, Safety, and Security;
- EBRD PR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- EBRD PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- EBRD PR8: Cultural Heritage;
- EBRD PR10: Information Disclosure and Stakeholder Engagement;

The following EBRD Performance Requirements are deemed out of scope and not applicable for the Project:

- EBRD PR7: Indigenous People¹;
- EBRD PR9: Financial Intermediaries.

Other relevant standards to consider are:

- International Labour Organization ("ILO") core conventions pertaining to labour standards and conditions of employment;
- United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs);
- Any international conventions and treaties relating to the environment and social performance that the host country has ratified or is part of;
- EBRD, Supply Chain Management Systems – Solar Supply Chains, Client Guidance; and
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

1.3 ASSESSMENT METHODOLOGY

The methodology utilized in this ESDD report involves assessing the Project's compliance with the relevant standards outlined in section 1.2.

This report is based on the following tasks:

- Kick-off Meeting: this included the overall Project management throughout the entire process, which held in 10.11.2023, to gain an understanding of the Project, confirm the proposed scope of work, time schedule and work team.
- Information review: this included multiple desktop reviews of the E&S documentation produced made available up to 20.11.2023. The documents reviewed are detailed in Appendix A and photos are presented in Appendix B.
- Site visit: a site visit was conducted by ERM on 16.11.2023 with the accompany of Client's Representatives.

The findings have been listed in the following Compliance Summary Table providing a systematic review of the Project's compliance with the EBRD Environmental and Social Policy (ESP), 2019, as defined through the applicable Performance Requirements (PRs).

Based on the compliance review, ERM has prepared the Environmental and Social Action Plan (ESAP) Table. ESAP has been developed to track the the further actions to be taken by responsible parties including timing and indicators of completion and actions were grouped according to relevant EBRD PRs.

To justify the scoring a brief commentary is provided along with actions required by the Client to achieve full compliance with each requirement. These actions will be later on connected with the ESAP.

1.4 LIMITATIONS

This ESDD Report has been conducted based on the Kick-off meeting with Client and desktop review of documents provided to ERM by Client. ERM assumes that the data provided is sufficiently complete and accurate for the purpose of this Assignment; ERM was not able to

¹ PR7 (Indigenous peoples) are not applicable because there are no indigenous peoples in Türkiye per EBRD definition. Additionally, EBRD PR9 which refers to Financial Intermediaries is also not applicable to the Project.

independently verify or corroborate the data provided. The results of the ESDD must be viewed within the scope, timing and resources allotted per the engagement for the Assignment.

Note that this Assessment was neither a full compliance audit nor an impact assessment. Rather, it was an environmental and social screening to identify the potential gaps against applicable standards.

Specific limitations on this assessment are as follows:

- This report is based primarily upon information obtained through cursory reviewed documents provided by Client, interviews, and other publicly available information obtained from the internet. No primary data collection has been undertaken.
- A technical review of Project design and operational performance was not carried out. This assessment was limited to review of outputs and conclusions of technical studies performed by third parties.
- The information provided in this report is not to be construed as legal advice.
- We disclaim any responsibility to the Client and others in respect of any matters outside the scope of the above.
- ERM did not independently verify information provided by Client. Therefore, our findings are accurate and complete only to the extent that information provided to ERM was itself accurate and complete.

2. PROJECT OVERVIEW

2.1 BRIEF PROJECT DESCRIPTION

Uluborlu Solar Power Plant Project (hereafter “the Project”) has a total installed capacity of 54.9 MWm / 54.9 MWe and is located in Isparta Province, Uluborlu District, İleydağı and Güneykent Villages. The Project will act as an auxiliary source of the existing 61.2 MWm / 60.00 MWe Uluborlu Wind Power Plant Project. In total, the capacity will be 116.19 MWm / 60 MWe.

The Project consists of 3 different polygons which are shown in Figure 2-1 below. In the figure, the blue lines represent the license area, T1-T36 represents the existing wind turbines and GES1-GES3 represents the planned solar power plant areas.

The general layout and main access to the Project area is shown in Figure 2-1. Access to the Project will be carried via already existing roads and no new access roads are planned and no access road improvements have been envisaged as part of the Project.

Internal access roads will be designed and constructed inside the Project area. There will be 3 internal access roads with distances of 400 m (between GES3 and T27), 800 m (between GES1 and GES2) and 1200 m (between GES1 and main road).

There will not be any overhead energy transmission line planned to be established within the scope of the Project. There will only be underground energy transmission lines which will be constructed adjacent to newly planned internal access roads. The lengths of underground energy transmission lines and locations are presented in Table 2-1.

TABLE 2-1 LENGTHS OF ENERGY TRANSMISSION LINE

No	Length (m)	Location
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1	400	Between GES3 and T27
2	800	Between GES1 and GES2
3	1200	Between GES1 and main road

According to the EIA and discussions with Client, the project areas are privately owned. The status of three internal access roads is non-registered area.

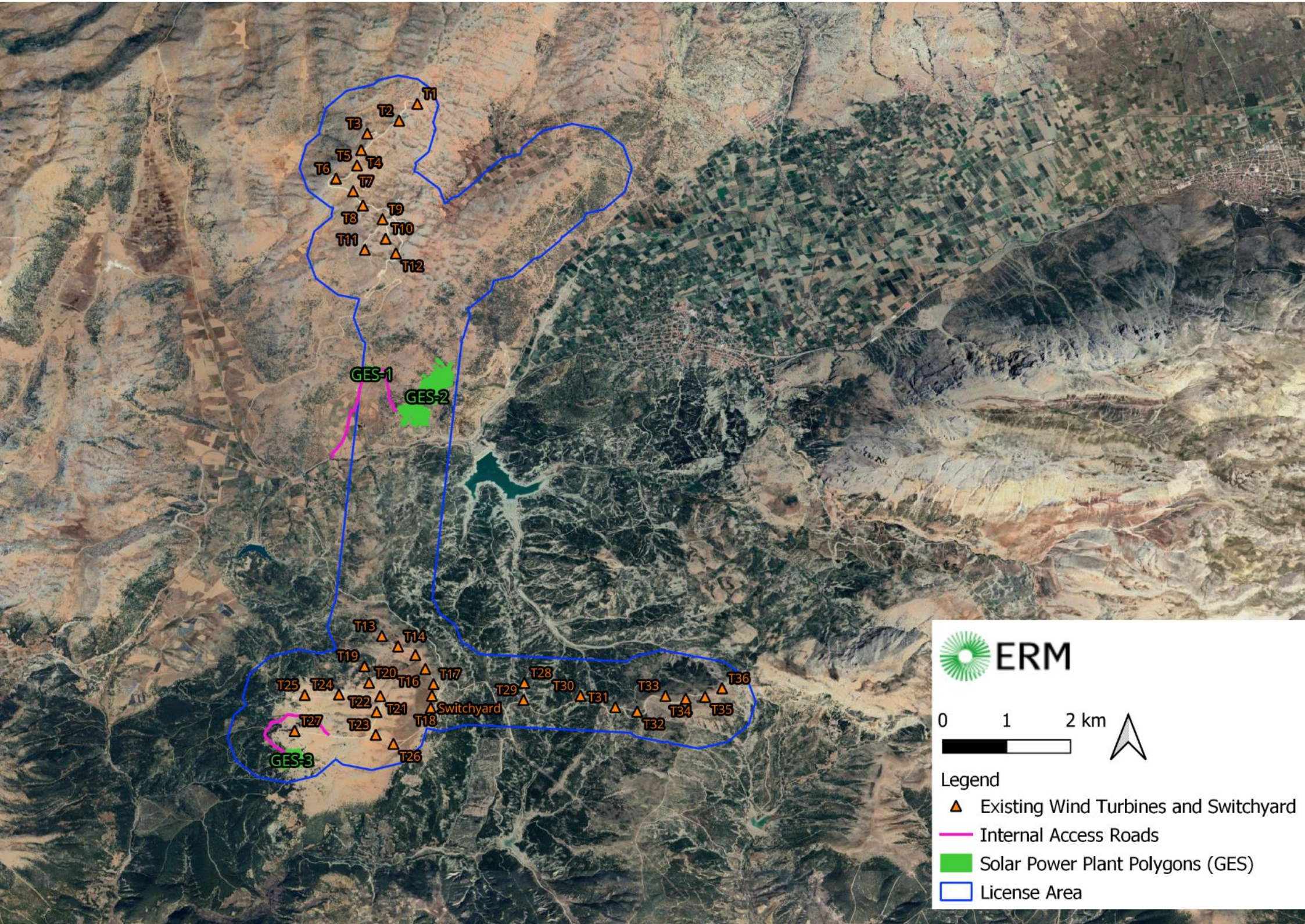


FIGURE 2-1 PROJECT LAYOUT

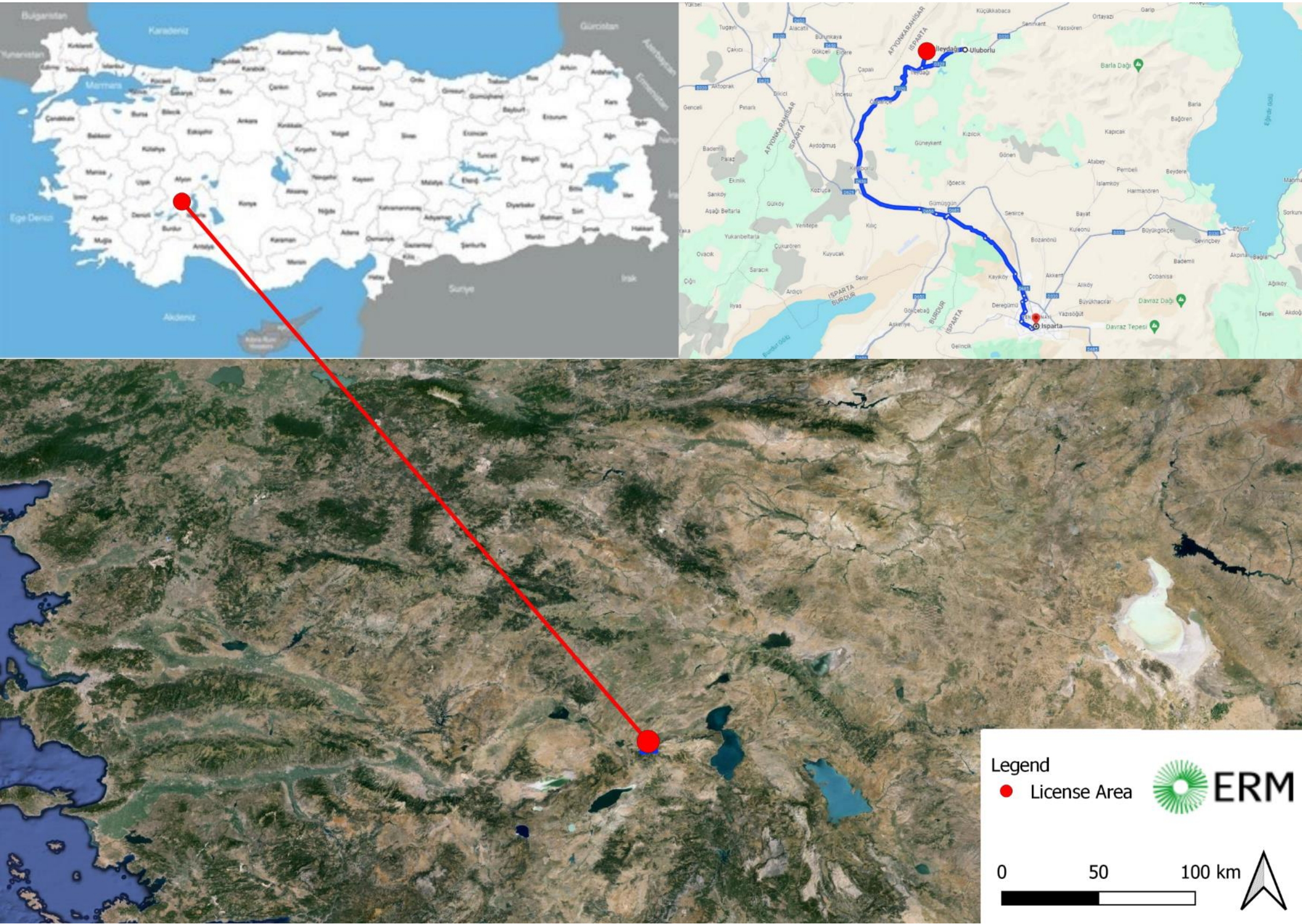


FIGURE 2-2 PROJECT LOCATION MAP

The closest settlements to the Project area is İleydağı Village which is about 500 m from the GES-1 and GES-2 polygons and Uluborlu District which is about 2.5 km. Nearest settlements of the Project are shown in the Figure 2-3.

A summary of the latest Project schedule provided for review is summarized in Table 2-2. According to the information provided and the site visit conducted within the scope of this Assignment, no construction activities have been started. The construction period of the Project is estimated to be six months and operational period is estimated as 25 years.

TABLE 2-2 PROJECT SCHEDULE

Task	Start Date	End Date
Mobilization	13.05.2024	24.05.2024
CCTV and Lighting	01.06.2024	30.07.2024
Construction	01.06.2024	15.11.2024
Test and commissioning	01.11.2024	30.11.2024

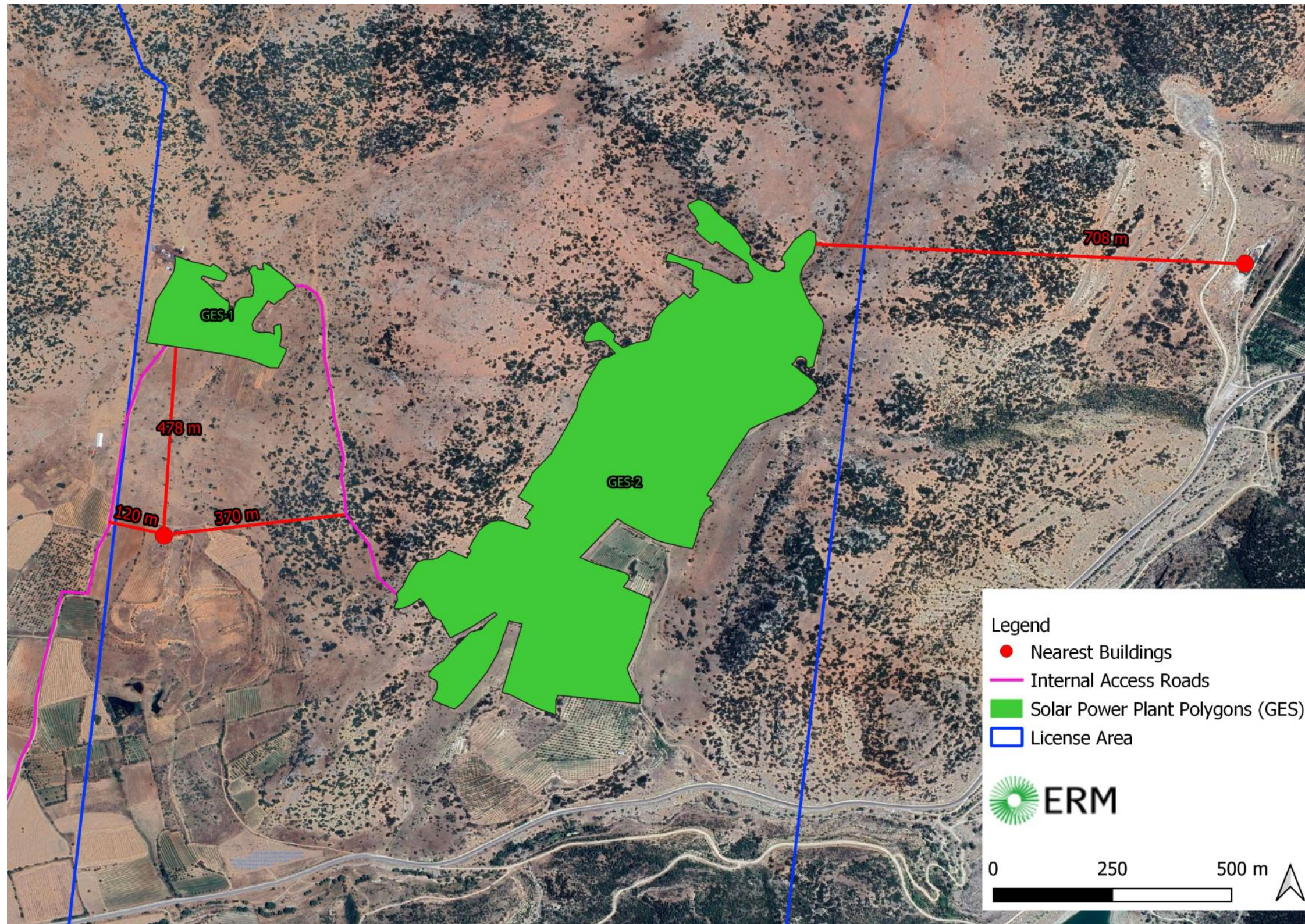


FIGURE 2-3 NEAREST SETTLEMENTS-1

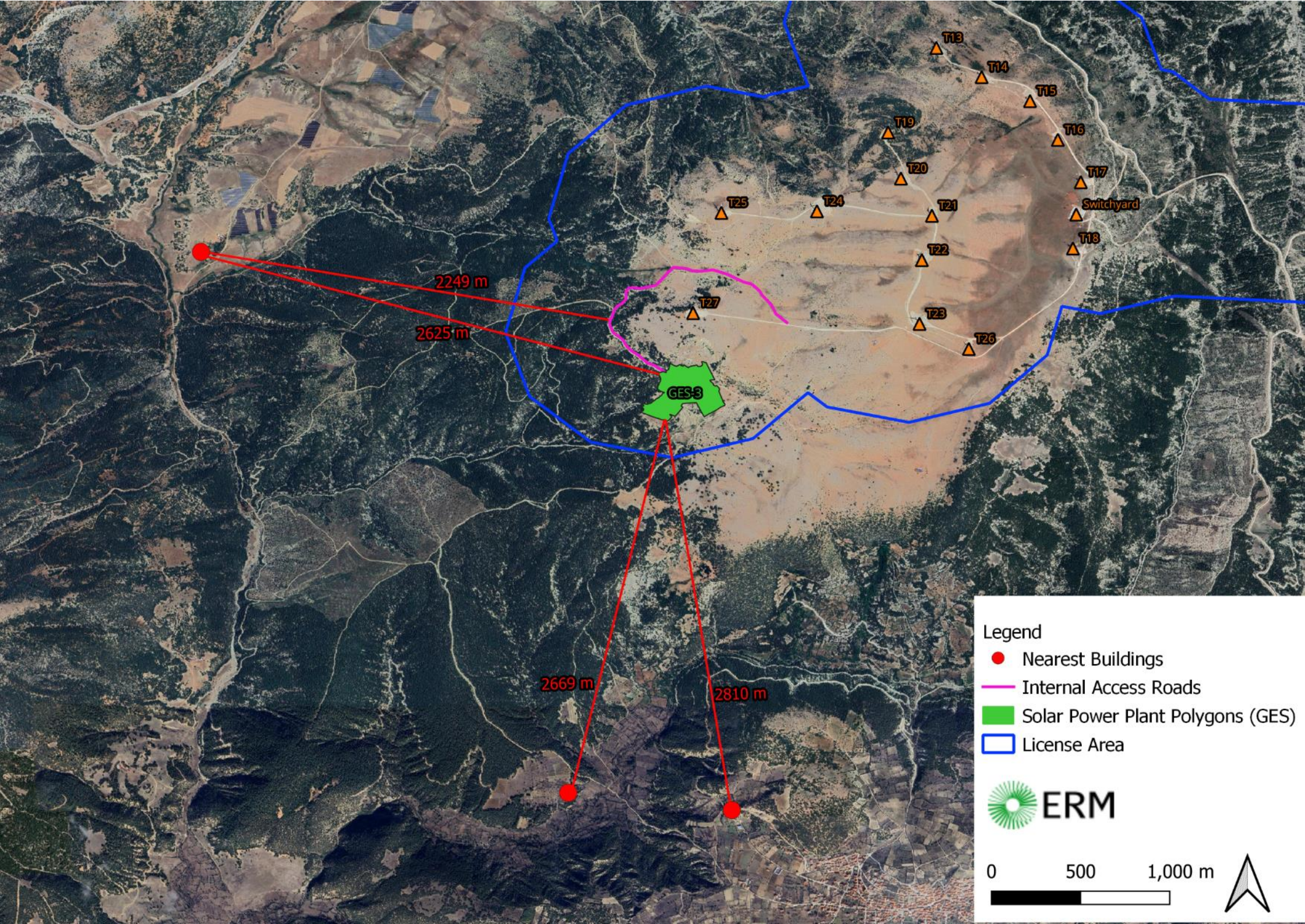


FIGURE 2-4 NEAREST SETTLEMENT-2

2.2 PROJECT PARTIES

An overview of the key Project parties is presented below.

TABLE 2-3 KEY PROJECT PARTIES

Role	Entity
Project Owner	Fiba Yenilenebilir Enerji Holding A.Ş.
Special Purpose Vehicle (SPV)	Kavram Enerji Yatırım Üretim ve Ticaret A.Ş. a subsidiary of Fiba Yenilenebilir Enerji Holding A.Ş.
Engineering, Procurement, and Construction (EPC Contractor)	Tegnatia Enerji Üretim San. ve Tic. A.Ş.
Primary Panel Supplier	Alfa Solar Enerji ve Sanayi Ticaret A.Ş.

2.3 ASSOCIATED FACILITIES

According to the EBRD definition, Associated Facilities are described as: *"Facilities or activities that are not financed by EBRD as part of the project but which in the view of EBRD are significant in determining the success of the project or in producing agreed project outcomes. These are new facilities or activities: (i) without which the project would not be viable, and (ii) would not be constructed, expanded, carried out or planned to be constructed or carried out if the project did not exist"*.

There will not be any overhead energy transmission line, any water pipeline, external access roads and any other facilities planned to be established within the scope of the Project.

2.4 PROJECT PERMITTING STATUS

The main permits and approvals applicable to the Project are given below.

TABLE 2-4 PROJECT PERMITTING STATUS

Topic	Permit	Status
General	License Applications for the Project	Obtained
Land Use	Public Interest Decision	Obtained
	Approval of Expropriation Plan	Obtained
	Expropriation Process	Ongoing
	Permit for the use of Forest Area (access roads)	Ongoing
Construction	EIA Approval	Obtained
	Permits and approvals for roads, water bodies, energy supply lines, utilization of municipal infrastructure etc.	Ongoing
	Construction Permit	Ongoing
Operation	License Application	To be Obtained

Topic	Permit	Status
	Temporary Operating Certificate and Environmental Permit	To be Obtained

2.5 PROJECT CATEGORIZATION

According to the EBRD's Environmental and Social Policy, 2019, each project should be categorized to determine the nature and level of environmental and social investigations, information disclosure and stakeholder engagement required. The approach should be commensurate with the nature, location, sensitivity and scale of the project, and the significance of its potential environmental and social impacts. All projects are divided in three categories:

- Category A: when a project could result in potentially significant environmental and/or social impacts, including direct and cumulative environmental and social impacts, which are new and additional and, at the time of categorisation, cannot readily be identified or assessed. Projects categorised as A require a formalised and participatory environmental and social impact assessment process.
- Category B: when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures. The scope of environmental and social appraisal will be determined by EBRD on a case-by-case basis.
- Category C: when it is likely to have minimal or no potential adverse environmental and/or social impacts.
- Category FI: a project will be categorised as FI if the financing structure involves the provision of funds through Fis.

According to the environmental and social categorization criteria outlined in the relevant standards mentioned above, and following discussions with the potential Lender, analysis of available data, review of the national EIA, and site visits, the Project has been classified as "Category B".

3. ENVIRONMENTAL AND SOCIAL COMPLIANCE REVIEW

The findings have been listed in the following Compliance Summary Table providing a systematic review of the Project's compliance with the EBRD Environmental and Social Policy (ESP), 2019, as defined through the applicable Performance Requirements (PRs).

For all PRs and their associated indicators, the following steps have been followed:

- Decision whether the PR or specific indicator is applicable. If the Project has no significant aspects relevant to PR or the indicator (i.e. no risks), the indicator is scored "**N/A**".
- A general high-level summary of overall compliance with the PR is given.

For all other relevant indicators, the scoring is as follows:

EC	Exceeding Compliance (EC): The Project has gone beyond the expectations of EBRD's PR requirements. EBRD should be able to use projects rated EC as a role model for positive Environmental and Social effects.
FC	Fully Compliant (FC): The Project is fully in compliance with EBRD's requirements, and European (EU) and local environmental, health and safety policies and guidelines.
PC	Partial Compliance (PC): The Project is not in full compliance with EBRD's requirements, but has systems, processes or mitigation measure in place which are working towards addressing the deficiencies.
MN	Material Non-compliance (MN): The Project is not in material compliance with EBRD's requirements, and the systems, processes and mitigation measures in place are not working towards addressing the deficiencies.
NOP	No Opinion Possible (NOP): Based on the data provided to date, ERM has not been able to form a definitive position on the subject being discussed.

PR1: Assessment And Management of Environmental Risks And Impacts

PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
1.1	<i>Environmental and Social Assessment</i>	PC	The EIA does not include a description of the mitigation hierarchy applied for the Project (avoid, minimize, restore, compensate/offset).	Define a mitigation hierarchy for the Project and integrate these adjustments into the ESIA assessments.	1.1
			The EIA does not include a climate change risk assessment. While it is anticipated that the Project will yield positive outcomes regarding climate change, it is crucial to evaluate potential impacts, such as GHG emissions during construction, and assess the Project's vulnerability to climate change risks.	Complete a climate change risk assessment for the Project.	
			The EIA provides a partial physical environmental baseline, offering brief overviews of the surrounding physical environment, including climatic conditions, geology, seismicity, hydrology, and soils. However, it lacks site-specific environmental baseline information concerning air quality, noise, and soil. The collection of environmental baseline data commenced as of April 2024. Nevertheless, a comprehensive environmental impact assessment has yet to be conducted. While some impacts on the physical environment are acknowledged, their significance has not been evaluated. Mitigation measures must be explicitly outlined in the EIA to mitigate potential environmental risks and impacts, whether through avoidance, minimization, or compensation.	Complete the environmental baseline and impact assessment.	
		PC	The EIA presents a partial social baseline but lacks a clear explanation of the methodology behind this assessment. It does not include stakeholder or	Complete the social baseline and social impact assessment.	

PR1: Assessment And Management of Environmental Risks And Impacts

inputs from Project-Affected-Persons (PAPs) to strengthen the findings.

However, in February 2024 a social baseline to supplement the initial findings was initiated. It includes descriptions of the:

- Demographic profile of the area;
- The local economy and employment;
- Livelihoods;
- Land Use and land ownership;
- Ecosystem services;
- Local health, safety and security;
- Infrastructure and transportation;
- Education;
- Recreation and tourism;
- Social receptors;
- Community cohesion;
- Presence of vulnerable groups: and
- Potentially affected community and stakeholders

A proper social impact assessment (SIA) with a clear methodology has also not been conducted. However, based on the findings of the revised social baseline ERM was recently appointed to conduct the SIA. It will include the identification, assessment, and evaluation of the potential significance, severity, and magnitude of potential social/socio-economic impacts as a result of Project developments. The SIA will ensure that direct, indirect, cumulative, and both positive and negative impacts are sufficiently considered.

The Client has also not developed any human rights risk assessment, screening, and/or baseline descriptions. Thus, the updates SIA will include a human rights impact assessment (HRIA).

PR1: Assessment And Management of Environmental Risks And Impacts

			Moreover, after the SIA is developed sufficient mitigation measures will be developed and implemented (considering the mitigation hierarchy) to avoid, minimize, mitigate and where necessary remedy the potential social risks and impacts. This will include mitigation measures pertaining to contractor and supplier management as well.		
1.2	<i>Environmental and Social Management Systems</i>	PC	<p>The Project did not have a project specific environmental and social management system. After completion of preliminary findings phase, preparation of environmental and social management system including sub plans, procedures and policies has been initiated for construction phase.</p> <p>No evidence of an Environmental and Social Management System for operation phase provided.</p>	Please refer to Item 1.4	1.2
1.3	<i>Environmental and Social Policy</i>	FC	<p>The client has a corporate Sustainability Policy detailing their commitments to preserving natural resources and making sure that sustainability is an integral part of their business. This includes:</p> <ul style="list-style-type: none"> • Carrying out all operations in compliance with ethical rules, standards, legal and other requirements • Informing local communities, civil society and all relevant stakeholders about investments, considering the importance of communicating with stakeholders for mitigation of risks and establishing lasting relationships • Prioritizing employment of local communities in the regions of operations • Contributing to local development by supporting the regional needs in communication with local citizens of the relevant regions 		1.2

PR1: Assessment And Management of Environmental Risks And Impacts

			<ul style="list-style-type: none"> • Raising awareness of both employees and stakeholders in matters such as climate change, sustainability, quality, environment, energy efficiency and occupational health and safety • Acting in accordance with the UN Sustainable Development Goals in determining operations and setting goals • Complying with the 10 principles of the UN Global Compact <p>The Client has corporate Environmental, HR, OHS, Quality, and Supply Chain Policies</p>		
1.4	<i>Environmental and Social Management Plan (ESMP)</i>	PC	<p>The Client does not have a Project-specific Environmental and Social Management System (ESMS), nor are there corresponding sub-management plans.</p> <p>However, the Client has begun preparing an ESMS and affiliated management plans to manage the Project's Environmental and Social (E&S) performance via clear policies, procedures, and organizational capacities. This has only been initiated for the construction phase and not the entire Project life cycle.</p> <p>Currently, there is no evidence or information suggesting that there is an ESMS for the Project's operation phase.</p>	<p>The Client is in the process of developing an ESMP with other distinct environmental and social management plans such as a Stakeholder Engagement Plan (SEP) and Livelihood Restoration Plan (LRP). Additional environmental and social assessments are currently being undertaken in order to properly inform the development of these plans for the construction and operation stages of the project.</p> <p>The E&S management plans will also:</p> <ul style="list-style-type: none"> • Reflect the mitigation hierarchy; • Include findings from stakeholder engagement; • Included distinct measures for PAPs and the identified vulnerable groups, to ensure that adverse impacts are not exacerbated or cause disproportionate harm and that all relevant/affected persons may enjoy Project opportunities; 	1.2 1.5

PR1: Assessment And Management of Environmental Risks And Impacts

				<ul style="list-style-type: none"> • Identify areas/actions to improve the Project's E&S performance; • Specify key targets, objectives and key performance indicators (KPIs) that will be used to track the success of actions over the specified timelines; • Elaborate on the distinct organizational capacities including clearly distinguished roles and responsibilities in order to carry out the specified actions/objectives; • Communicate changes in the Project and/or management plans to relevant stakeholders in a timely manner; and • Actively update Project documentation and be actively responsive to Project changes. 	
1.5	<i>Organizational Capacity and Commitment</i>	PC	<p>The client should upgrade the organizational structure depicting the internal roles for EHS and social performance management for the Project. This would include an organogram with reporting lines (and any vacant positions) and accompanying details on roles and responsibilities related to the Projects' on-going assessment and management of social risk and impacts. Key social responsibilities should be defined and communicated to stakeholders.</p> <p>There are no Project specific established organizational structures to manage the Project's overall social performance nor carry out stakeholder engagement. These roles and responsibilities have also not been communicated to stakeholders.</p>	<p>Establish an organizational structure for the Project's team including roles and responsibilities related to environmental, health and safety and social performance management. Contractor roles and responsibilities to be defined.</p> <p>The Client should develop a Supply Chain Management System (SCMS) and ensure that there is enhanced organizational capacity to manage and prevent risks. Specific attention must be paid to human rights risks, especially forced labour as there is a higher risk of this due to the nature of the Project (solar). Assessment of human rights risks and management</p>	1.5

PR1: Assessment And Management of Environmental Risks And Impacts

			The Client also has no organizational capacity to manage human rights risks in the supply chain nor overall roles and responsibilities related to supply chain management.	must be integrated into the decision-making systems and define accountability for impact mitigation and remediation if/where adverse impacts do arise.	
1.6	<i>Supply Chain Management</i>	PC	<p>No evidence of an effective Supply Chain Management System (SCMS) to address human rights risks in the supply chain was provided.</p> <p>The Client has Some policies and procedures for managing supply chain risks are in place and have recently been updated and/or developed.</p>	The client shall adopt and implement an effective SCMS to identify and manage potential adverse impacts in the Project's solar supply chain (see 2.9 for further information).	1.8
1.7	<i>Project Monitoring and Reporting</i>	MN	<p>There is no indication of the Client's approach or protocols for monitoring and reporting on the Project's social performance. It is unclear how social risks and impacts will be assessed, tracked, ameliorated, and reported on throughout the Project's life cycle. There are no measures for reporting on stakeholder engagement nor are there specific indications for how lessons and identifying new opportunities will be captured.</p> <p>There is no mention of corrective and preventative action plans, nor follow-up on how these are implemented.</p>	<p>After development and implementation of the ESMP and ESAP the Client must define the procedures for monitoring and reporting on the Project's overall social performance including how successfully they:</p> <ul style="list-style-type: none"> • Meet the EBRD PRs; • implement the actions specified in the ESMP and ESAP; • provide corrective actions and their efficacy; • identify, integrate, and/or ameliorate obstacles or lessons learned into Project design/activities; • conduct stakeholder engagement and meet the objectives laid out in the SEP. <p>Monitoring and reporting specifications must include clear timelines, roles and responsibilities, and KPIs to track success/efficacy.</p>	1.9

PR1: Assessment And Management of Environmental Risks And Impacts

				The Client will decide with the EBRD how often reporting on the Project's social performance will be provided.	
1.8	<i>Permitting</i>	PC	It is likely uncertain how the Client monitors the entire validity of its permits, ensures adherence to the stipulated requirements within each permit, and assesses the Project's compliance with these specifications. ERM has been apprised that the management of permits falls under various departments within the Client's organization, including sustainability, environmental, and legal teams.	ERM advises that the overall status of these permits and their corresponding requirements should be collectively understood and overseen by the entire sustainability team.	1.3

PR2: Labour and Working Conditions					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
2.1	Human Resource Policies and Working Relationships	PC	<p>The Client has some general company policies and principles on their website related to labour and working conditions.</p> <p>The client has also established the internal Working Group on Employee Satisfaction that monitors employee needs and set targets to inform the company's internal sustainability committee. Overall, they track overall employee satisfaction, access to trainings, experiences amongst employees of different genders, conduct monitoring and evaluation on the quality and inclusiveness of internal processes, and identify the amount and content of employee grievances (only in so far as they relate to the Company Code of Ethics and potential violations).</p> <p>The Client has a Human Resources (HR) Policy, including provisions for a human rights policy. The scope of the HR policy applies to all of the Client's employees. Commitments include:</p> <ul style="list-style-type: none"> • Fulfilling and following the requirements under laws for protecting personal data; • Fulfilling the rights of all of Fiba's employees in line with Turkish national requirements; • And creating safe working conditions in accordance with Turkish labour laws, Occupation Health and Safety (OHS) guidelines, and the Social Security Act. <p>Upgrade the corporate policies to the Project specific.</p>	<p>The Client shall adopt and maintain a HR policy relative to Project needs (size and conditions of the employed workforce). The policy must be clear, accessible, and understandable to all workers. The policy shall include provisions related to gender, sexual harassment, discrimination, diversity and inclusion, and provisions for migrant workers.</p> <p>The Client will communicate the policy to the workforce and document such efforts; communication to all employees (including contractors and subcontractors) shall be conducted in their preferred language. Similarly, the terms of employment will also be clearly documented and include provisions such as wages, duration/hours of work, overtime benefits/arrangements, and any potential benefits. The terms of employment must be compliant with applicable national laws and respect the principles of ILO conventions 29, 105, 87, 98, 100, 111, 138, and 182.</p> <p>The Client shall also establish the following policies and protocols for the Project's workforce and to maintain proper working conditions:</p> <ul style="list-style-type: none"> • Code of Conduct and Ethics for employees and construction workers (including expected behavior and prohibited actions); 	2.1

PR2: Labour and Working Conditions

				<ul style="list-style-type: none"> • Labour Procurement Strategy; • A Human Resources Policy (including provisions related to gender, sexual harassment, discrimination, and diversity and inclusion etc.), provisions for migrant workers; and 	
2.2	<i>Child and Forced Labour</i>	PC	<p>The Client's human rights policy (in the company HR policy) states that Fiba "strictly does not permit forced labour, child labour, employment of illegal immigrants and of foreigners who do not have a work permit, any maltreatment or any act of exploitation."</p> <p>The Client's supply chain policy prohibits the use of forced and child labour. The policy only references international standards in relation to prohibition of the use of child labour (in accordance with Article 138 of the International Labour Organisation Convention) and does not refer to other international standards such as the UN Guiding Principles or the ILO Convention on forced labour. The Supply Chain Policy also does not address state-imposed forced labour. The Client does not currently have a due diligence process in place to monitor the compliance of suppliers against the policy, and does not require suppliers to conduct due diligence to ensure compliance.</p> <p>The Client provided a draft HSE and Social Monitoring Plan which identified monitoring processes to be undertaken during the construction phase. However, there are no monitoring actions related to child and forced</p>	<p>In the development of further Project-specific policies and protocols, cross-reference the commitments forbidding forced and child labour noted in the Corporate HR Policy.</p> <p>Ensure that the HSE and Social Monitoring Plan has a monitoring activity relating to the prevention of forced and child labour. The Contractor Management Plan and SCMS should also state what corrective action/remediation will be carried out if incidents of forced and/or child labour do occur.</p> <p>Considering the increased risk of forced labour along the Project's supply chain the Client shall only procure goods or materials with the appropriate evidence that the supplier has taken the necessary steps to eliminate conditions that may give rise to forced labour.</p>	2.1

PR2: Labour and Working Conditions

			labour. The plan is also not specific to the Uluborlu Project.		
2.3	<i>Non-Discrimination and Equal Opportunity</i>	PC	<p>Project documentation does not reflect commitment to maintaining non-discrimination and/or equal opportunity in the Project workforce and working conditions.</p> <p>However, the corporate HR Policy (applying to all employees) does state that the Client values employee diversity and "employee candidates without any discrimination related to race, religion, language, color, ethnicity nationality, gender, marital status, age or disability." Similarly, it states that they "implement all HR processes without making any such discrimination." The policy also states that recruitment is carried out without discrimination. The Human Rights Policy section notes that 'as a company that always stands for equal opportunities, we (Fiba) equally uphold the rights of both female and male employees in all processes. They implement equal opportunities in all of their business processes. They support gender equality and ensure that all of their employees adopt an egalitarian jargon by means of corporate training programs.'</p> <p>Fiba also follows the guidelines of the Women's Empowerment Principles (to which they are a signatory since 2019) to "maintain the balance of workload between female and male employees."</p>	<p>Please refer to PR 2.1. Develop Project-specific HR policies and procedures and ensure these are communicated with employees, contractors and sub-contractors</p>	2.1
2.4	<i>Workers Organizations</i>	PC	<p>The corporate HR Policy statement does note in the Human Rights policy section that the Client "respects their employees' freedom of unionization, right to collective bargaining, and voluntary participation to appropriate social</p>	<p>Please refer to PR 2.1. Labour policies and protocols for the Project specifically shall explicitly establish the Client's commitment to or respect for their employees to freely</p>	2.2

PR2: Labour and Working Conditions					
			activities with the awareness of social responsibility.	join workers' organizations and exercise their freedom of association/collective bargaining. The respect of these freedoms shall be explicitly communicated to workers and reinforced in documentation/information disclosure pertaining to the GM usage, as well.	
2.5	<i>Wages, benefits, and conditions of work</i>	PC	<p>The Client has not provided any documents outlining the working conditions of the expected workforce for this Project. It is ERM's understanding that they have not yet developed this documentation, especially the provisions related to wages and benefits.</p> <p>However, the corporate HR Policy does include provisions for the compensation policy – it highlights their commitment to fair and competitive compensation. It also notes that they conduct periodic independent compensation surveys to reassess the compensation and benefit strategies of the company.</p>	Please refer to PR 2.1. The Client must also develop contracts and terms of employment indicating the wages, benefits and overall conditions of work. These shall be made applicable for contractors and sub-contractors.	2.1 2.3
2.6	<i>Worker Accommodation</i>	N/A	It is understood, the client will not provide worker accommodation	N/A	
2.7	<i>Collective Dismissals/Retrenchment²</i>	N/A	N/A	N/A	
2.8	<i>Grievance Mechanism</i>	PC	The Client has not established a GM or tool to address grievances and incidents among the Project workforce. No information on the procedure or protocols to address workplace concerns has been provided.	Enhance the Project's organizational capacity for managing overall social performance in order to properly implement the GM and handle grievances. Implement the workers	2.2

² Will not be applicable to many projects at appraisal stage. However, evidence, within the last 3 years of client approach to retrenchment, which is not compatible with the Policy should be taken into consideration.

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			<p>However, a GM, including the protocols for establishing and maintaining a tool for workers to raise concerns is being developed as part of the SEP. It will include the protocols to log, record, investigate and resolve grievances, along with the proper roles and responsibilities for implementing and maintaining the mechanism.</p>	<p>grievance mechanism as per the SEP and EBRD PR2, and establish a grievance register/log. Provide to ERM for review.</p> <p>Communicate how and where this tool can be accessed and used to the Project employees and document communication efforts. This will be extended to the contractor workforce as well.</p>	
2.9	<i>Supply Chain</i>	PC	<p>As part of the present ESDD, the client commissioned a first human rights risk assessment connected to the Project's solar supply chain. The assessment concludes that, due to the lack of evidence of effective management systems by EPC Contractor and Primary Supplier (see 2.2), the exposure to human rights risk in the supply chain remains.</p> <p>The client has not shown the capacity to manage human rights risks through an effective Supply Chain Management System (SCMS).</p> <p>Only few policies and procedures are in place which have recently been updated, however various shortcomings have been identified:</p> <ul style="list-style-type: none"> • The Client has no clear commitment in place to conduct human rights due diligence in line with international standards (i.e. UNGPs, OECD guidance) • An updated Supply Chain Policy (updated 25.01.2024) is in place which outlines Client's expectations of its suppliers including the prohibition to use forced and child labour. However, the policy does not include the requirement for suppliers to 	<p>Based on the findings of the supply chain risk assessment as part of the ESDD, the Client shall develop and implement an effective Supply Chain Management System (SCMS) including:</p> <ul style="list-style-type: none"> • Embed human rights risks in the supply chain within decision-making systems, defining accountability and responsibility within the client organizational structure • Establish KPIs at corporate and project levels for reviewing and acting on human rights due diligence in the supply chain • Update contract clauses with supplier on labour risks and management including the right to conduct audits. • Adopt 'auditability' principles as a pre-requisite for social audits, including: privacy of workers during interviews, transparency of documentation, unfettered access to facilities, independency of auditors. 	2.4

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			<p>conduct due diligence to ensure compliance. Upon contract signing the policy reportedly is included in the Annex of the contract</p> <ul style="list-style-type: none"> • A procurement procedure (updated 25.01.2024) is in place however human rights risks are not at all or only at a high level taken into consideration during the tendering process (supplier identification/pre-assessment; offer evaluation; contract purchase and post-purchase site entry criteria). Examples of documents that may be requested as part of the environmental and social evaluation of the potential supplier are listed (i.e. supply chain mapping, E&S compliance assessment reports), it is however unclear whether all suppliers are required to provide the information and how the information is evaluated. Apart from H&S and environmental requirements no further human rights requirements are included in the supplier post purchase site entry criteria. • As part of the procurement process suppliers are required to complete an ESG survey (updated 25.01.2024) which includes some high-level questions related to the supplies' policies and procedures in place (incl. child/forced labour, discrimination, working hours, wages, freedom of association etc). According to the updated pre-supplier evaluation form (updated 26.01.2024), the results of the ESG survey and of an open-source screening are considered in the supplier approval process. The evaluation criteria and scoring system applied are however not clear. No evidence of the pre-screening 	<ul style="list-style-type: none"> • Incorporate the requirements of auditability into contracts with suppliers. The Client should be able to terminate a sourcing contract if any of the criteria on auditability are not met. • Clearly communicate the requirements to suppliers and provide training (if necessary). • Require visibility of supply chains from raw materials to PV panels. Review traceability protocols from solar module suppliers down to wafer/ingot producers and, if possible, down to polysilicon, and consider on-site spot checks to verify volume and capacity and whether inconsistencies are present. • Assess its leverage in relation to its suppliers, considering elements such as the degree of trust, stability of supply, length of business partnerships. • Taking into consideration the leverage to design its SCMS, aiming at increasing leverage over time. • Develop KPIs to monitor and track the effectiveness of the measures in place • Establish a grievance mechanism that is accessible to external stakeholders and require the EPC Contractor to have an effective grievance mechanism in place and to 	
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PR2: Labour and Working Conditions

			<p>and the ESG survey conducted in relation to the PV supplier was provided.</p> <ul style="list-style-type: none"> The general, non-project specific HSE Contract provided, only includes some high-level requirements related to some human rights. No evidence of a grievance mechanism was provided for this project that is accessible external stakeholders. Only a grievance mechanism for the Uluborlu Project was provided, which does not explicitly include a no-retaliation policy. No evidence is in place that the client requires the EPC Contractor to have an effective grievance mechanism in place, and to cascade down this requirement to the PV supplier. No evidence of a system in place for mitigation/remediation in case an incident is reported/identified. 	<p>cascade down the requirement to the PV supplier.</p> <ul style="list-style-type: none"> Establish a system for mitigation/remediation in case an incident is reported/identified. 	
2.10	<i>Non-Employee Workers</i>	PC	<p>The Client has not developed any specificities related to the working requirements of non-employees or third parties (sub-contractors or other intermediaries).</p>	<p>Develop Contractor Management Plan in line with identified risks and impacts associated with non-employee workers.</p> <p>Incorporate relevant E&S management plans conditions into tender documents, and contracts for all contractors and ensure dissemination into sub-contractor contracts.</p>	2.1 2.2
2.11	<i>Occupational Health and Safety (OHS)</i>	PC	<p>The Client has an OHS Policy publicly available on their company website that intends to ensure and maintain OHS for relevant stakeholders (including employees), sub-employers, and all affiliates of the holding.</p> <p>The EIA mentions some general provisions to mitigate OHS risks and impacts in the workplace</p>	<p>The Client must develop a Project-specific OHS Management Plan including protocols/plans for workplace safety and accident prevention plan. These plans shall establish synergies with the Emergency Preparedness and Response Plan (EPRP) to maximize efficiencies.</p>	2.3

PR2: Labour and Working Conditions

			<p>(i.e. training, the wearing of protective equipment) and confirms that Project activities will be in accordance with Turkish OSH laws.</p> <p>There is no workplace safety and accident prevention plan in line with EBRD PRs and national laws.</p>	<p>Appropriate mitigation measures for potential adverse impacts to OHS shall also be clearly identified/elaborated upon in the OHSMP.</p>	
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PR3: Resource Efficiency and Pollution Prevention and Control

3.1	<i>Emissions to air</i>	PC	<p>No site-specific air quality baseline assessment was conducted during the EIA. The EIA contains an PM10 and SO2 measurements from the Isparta Station from 2021. However, Isparta Province Central MTHM Station is located around 20 km south of the Project which does not represent site specific conditions.</p> <p>The air quality baseline collection has been commenced as of April 2024.</p>	Complete the air quality baseline and impact assessment.	1.1 3.1
3.2	<i>Emissions to water</i>	PC	<p>The most important lakes, ponds, and streams in the Isparta Province are included in the EIA's surface water baseline chapter.</p> <p>The groundwater baseline in the EIA mentions information on total withdrawal of groundwater in the Isparta Province. For groundwater quality the EIA mentions that the quality is in the C2S1 irrigation water class however, no further explanations are provided, and it is unclear whether the groundwater quality is within the applicable standards.</p> <p>The EIA does not provide an inventory of emissions to water for the project.</p> <p>According to the EIA, wastewater produced by workers during the construction and operation phases will be kept in septic tanks and transferred to the Güneykent Municipality. The total volume of wastewater produced daily was also determined in the EIA.</p>	<p>Provide more details on the groundwater quality comparing them to the applicable standards.</p> <p>Provide an inventory of emissions to water for the project.</p>	1.1 3.1
3.3	<i>GHG emissions</i>	PC	The total amount of greenhouse gas emissions during the construction period is not determined by the EIA. In the EIA, only the emission	Provide the total amount of greenhouse gas emissions per year during construction.	3.1

			quantity in kilograms per hour was evaluated. Projects that have gross emissions of more than 100,000 tons of CO ₂ -equivalent yearly or a net change in annual emissions of 25,000 t CO ₂ e are required to disclose such emissions to the Bank annually in accordance with the EBRD's ESP.		
3.4	<i>Energy use and efficiency</i>	PC	<p>The EIA identifies actions regarding energy efficiency of the solar panels. Nonetheless, no evaluation of consumables and wastes was done. The EIA makes no mention of the anticipated energy use for the Project's construction and operation.</p> <p>No strategy to reduce energy usage and to re-use/recycle waste materials was established.</p>	<p>Provide details regarding consumables, waste, and anticipated energy usage throughout the construction and operation phases of the Project.</p> <p>Formulate a plan and implement measures to reduce energy consumption, aiming for mitigation and efficiency.</p>	3.1
3.5	<i>Water use</i>	PC	<p>The EIA specifies the water required for cleaning solar panels and estimates the water usage by workers. During construction, water will be used by workers and for controlling dust.</p>	<p>Offer the complete water requirements for both construction and annual operation, detailing the water's origin. Also, present strategies for minimizing water consumption.</p> <p>Create a waste and wastewater management strategy encompassing the total water usage for both construction and operational stages, indicating its sources, and outlining mitigation, treatment, and disposal procedures for wastewater.</p>	3.1 3.2
3.6	<i>Waste generation</i>	PC	<p>The EIA provides estimations for the daily total of solid waste generated during both construction and operation phases.</p> <p>As per the EIA, domestic solid waste is collected in garbage containers and put in the waste containers of Uluborlu Municipality. It is however unclear how it will be disposed. Regarding packaging waste, the EIA states that</p>	<p>Develop a waste and wastewater management plan.</p>	3.1 3.2

			<p>it will be disposed according to Turkish regulation.</p> <p>Developing a waste management plan is essential to showcase technically and financially viable alternatives for environmentally responsible disposal methods.</p>		
3.7	<i>Hazardous substances and materials</i>	PC	<p>According to the EIA in case hazardous waste such as oil, fuel, paint, etc. will be generated it will be disposed in licensed disposal facilities through licensed carriers. The EIA also states the disposal of end of life tires, batteries and accumulators as well as medical waste in accordance with national regulations. Broken panels will be delivered to licensed disposal facilities and recycled/disposed of.</p> <p>The EIA does not specify how hazardous substances and hazardous waste will be stored temporarily on site.</p>	<p>Specify the technicalities and the mitigation measures taken for storing hazardous substances and hazardous waste on site.</p>	<p>3.1</p> <p>3.2</p>
3.8	<i>Pesticides</i>	N/A	It is not expected that pesticides will be used during construction or operation of the Project.	N/A	
3.9	<i>Persistent organic pollutants (POPs)</i>	N/A	N/A	N/A	
3.10	<i>EU REACH chemical safety regulation</i>	N/A	N/A	N/A	
3.11	<i>Refrigerants</i>	N/A	N/A	N/A	
3.12	<i>Contaminated land</i>	N/A	N/A	N/A	

3.13	Noise	PC	<p>No baseline noise measurements have been conducted as part of the EIA. The EIA should also identify the nearest noise receptors in the AoI (such as houses, public buildings, schools, hospitals).</p> <p>Additional general mitigation measures regarding noise need to be considered (e.g., speed limits for construction traffic, avoid noisy nighttime works, etc.)</p> <p>As of February 2024, the noise baseline collection has been initiated.</p>	<p>Complete the noise baseline and impact assessment.</p> <p>Identify noise receptors in the AoI and elaborate on mitigation measures for noise.</p>	<p>1.1</p> <p>3.1</p>
3.14	Odor	N/A	It is not expected that the Project includes activities that could potentially generate odors.	N/A	
3.15	Circular economy	FC	The EIA shows considerations with regards to circular economy techniques. Packaging waste or damaged panels will be recycled. Extracted topsoil during construction will be reused during landscaping works.		

PR4: Health, Safety, and Security					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
4.0	<i>General Requirements for Health and Safety Management</i>	PC	<p>The EIA states that during Project works “all legislative provisions regarding to OHS will be fulfilled and necessary precautions will be taken to reduce all possible accidents and risks to the lowest level.” It also states that there will be a “Basic Occupational Health and Safety and Environmental Awareness training” in the orientation for all construction personnel.</p> <p>The Client has not evaluated the risks and potential impacts of the affected community in the design, construction, operation and decommissioning of the project; thus, preventative and mitigation measures have also not been established to protect community health and safety.</p> <p>Risks and potential impacts to human health are only discussed relative to OHS and labour. There are some general preventative measures to mitigate OHS risks and adverse impacts.</p>	<p>Develop an OHS Management system, as per national requirements.</p> <p>Develop a Community Health and Safety Management Plan that is specific to the Project and establishes synergies with the OHS management system. Ensure that the plan includes details on any mitigation/prevention measures for adverse impacts to community H&S, clearly defined roles and responsibilities and corresponding organizational capacities to implement the management plan, appropriate arrangements for emergencies (i.e. Emergency preparedness and Response Plan (EPRP)), linkages to the incidence and/or grievance mechanism.</p> <p>The plan shall also specify whether there will be required trainings and what they will consist of; in employee induction materials they shall be provided with the H&S training details.</p>	4.1
4.1	<i>Community Health and Safety</i>	PC	<p>Please refer to PR 1.1 and 4.0.</p> <p>The Client has not assessed project-related gender-based violence (GBV) risks of sexual exploitation, harassment, and abuse (SEAH) from Project activities to the affected community(s).</p> <p>ERM is currently preparing the SIA for the Project to properly assess and include measures for community health and safety</p>	<p>Please see PR 1.1 and 4.0 above.</p> <p>The SIA will include an assessment of project-related risks and potentially adverse impacts related to GBVH and SEAH.</p> <p>Ensure that confidential channels for the grievance mechanism are implemented for stakeholders/affected persons to submit sensitive information.</p>	4.1

PR4: Health, Safety, and Security

			<p>impact-prevention; this will include assessments for air and noise pollution.</p>	<p>The SIA will also include appropriate mitigation measures aligned with the mitigation hierarchy to prevent and minimize any negative impacts to community H&S. Appropriate mitigation measures and management plans will also include findings from consultations with stakeholders from the affected communities to ensure that the proposed measures are fitting.</p> <p>Training details shall also include provisions for awareness of and prevention against gender-based violence and harassment (GBVH).</p>	
4.2	<i>Infrastructure, Building, and Equipment Design and Safety</i>	FC	<p>The EIA shows some considerations for H&S in project planning for the construction and operation phase. The client has not yet developed plans for decommissioning.</p> <p>There is a general visual impact analysis, showing considerations for human health relative to the project's structural elements. It briefly discusses methods to prevent glint and glare.</p>	<p>When establishing plans for decommissioning activities, the Client will include considerations for H&S relative to infrastructure, equipment and structures.</p>	4.1
4.3	<i>Hazardous Materials Safety</i>	PC	<p>The Client states that no "flammable, explosive, dangerous, and toxic materials" will be used.</p> <p>The EIA states that hazardous waste generated during construction and operation will be dealt in accordance with the national "Waste Management Regulation". It also states that hazardous waste generated during construction will be collected separately from other waste and</p>	<p>Please see PR 4.0.</p> <p>In the OHS Management System and affiliated H&S Plans develop methods for managing how hazardous materials will be safely dealt with.</p>	4.1

PR4: Health, Safety, and Security

			<p>stored in “leak-proof containers”, labeled “hazardous waste”.</p> <p>The EIA also states that an insurance policy regarding hazardous waste will be taken out.</p>		
4.4	<i>Product and Services Safety</i>	N/A	The Project will not require or involve any production of and/trade of products/services.	N/A	
4.5	<i>Traffic and Road Safety</i>	PC	<p>The EIA includes some considerations for traffic and ground safety. It includes a high-level evaluation of the traffic-related effects and some precautions that shall be taken to reduce temporary traffic impacts during construction.</p> <p>There Client has not specified how traffic-related impacts and road safety will be monitored throughout the Project life cycle.</p>	<p>In the OHS Management System and affiliated management and monitoring plans include specifications for how traffic and road safety will be monitored.</p> <p>In the SIA evaluate the potential for traffic and road safety impacts on the local community.</p>	4.2
4.6	<i>Natural Hazards</i>	FC	The Client does generally assess risks of natural hazards (i.e. landslides, floods, and earthquakes) in the EIA. It recommends some preventative measures to help mitigate identified risks.	N/A	
4.7	<i>Exposure to Disease</i>	PC	The Client has not assessed the potential risk of exposure of workers on the nearby communities. Vulnerable groups have not been identified.	<p>Please refer to 4.0.</p> <p>In the OHS Management system and E6S management plans there shall be procedures specifying contractor workforce behavior and mitigation measures for disease prevention with the local community.</p>	4.1
4.8	<i>Emergency Preparedness and Response (EPRP)</i>	PC	The Client has not developed an EPRP. However, they have mentioned some	The Client shall develop and implement a full EPRP after the appraisal stage and include preventative measures and	4.3

PR4: Health, Safety, and Security

			responsibilities related to emergency preparedness for dealing with fires.	organizational capacities corresponding to the findings from the SIA. Roles shall be clearly defined. The plan must also be communicated to the workforce and to relevant stakeholders. The Client shall conduct training and drills with the community and workforce.	
4.9	<i>Security Personnel Requirements</i>	PC	<p>The EIA states that there will be security personnel during power plant operation to ensure that only employees and officers enter the work area. Security guards will also be on duty in the field area to prevent illegal hunting on the Project grounds and prevent other physical threats. The business area will be under a "24/7 security system".</p> <p>Security risks to the workforce and community have not been evaluated.</p>	<p>The Client shall develop a security management plan including appropriate measures to prevent the abuse of force from security personnel against workers and community members.</p> <p>Ensure that the Grievance mechanism is properly implemented.</p> <p>Provide appropriate training to security personnel and/or ensure that the security contractor provides their employees with suitable training aligned with the Voluntary Principles on Security and Human Rights.</p>	4.4

PR5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
5.1	<i>Avoidance or minimization of displacement</i>	PC	<p>The EIA states that there are no settlements in the Project area, thus “resettlement is not possible.” However, livelihood impacts have not been assessed to fully determine that there will be no displacement (economic or physical).</p> <p>Thus, a social baseline and SIA have been initiated and will include a proper assessment of the project’s land requirements and impacts on people to ascertain if there will be any for of displacement. The SIA will be guided by the mitigation hierarchy to avoid and minimize displacement and forced evictions. It will also be supplemented by stakeholder inputs to corroborate findings.</p> <p>Moreover, a resettlement expert has also been engaged to develop a Livelihood Restoration Plan (LRP) for the Project to minimize and offset impacts related to displacement</p>	Implement the proposed mitigation measures from the SIA and the requirements from the LRP and resettlement expert.	1.1
5.2	<i>Consultation</i>	PC	<p>According to the Client and current Project information, there is a public interest decision in favor of the Project. Expropriation has begun for the Project.</p> <p>A public participation meeting was held on 15.02.2022 by the Ministry of the Environment, Urbanization and Climate Change to ensure public participation in the EIA process and to inform the public of the project. However, as the SIA had not been completed nor had land/livelihood impacts been assessed as this point, stakeholders</p>	<p>The Client shall identify PAPs who may be impacted by the Project’s land requirements, acquisition and expropriation process. Conduct further engagements with relevant stakeholders and affected persons, ensuring that a diverse group of stakeholders are involved.</p> <p>Maintain and update the SEP in line with feedback and inputs from consultations,</p>	5.1

PR5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

			<p>were not consulted on these matters. Thorough stakeholder engagement has not been conducted for the Project (please refer to PR 10).</p> <p>The LRP and activities undertaken by the resettlement expert will also include engagement with stakeholders.</p>	<p>and findings from the resettlement expert. Develop synergies between the LRP and SEP for optimal and efficient project coordination and implementation.</p>	
5.3	<i>Consideration of Vulnerable Groups and Gender Aspects</i>	PC	<p>The Client has not identified or considered any potentially vulnerable groups or gender-related impacts because of Project activities.</p> <p>However, the social baseline and additional impact assessment studies were initiated in February 2024 and include the assessment of impacts to potentially vulnerable persons/groups. The LRP and assessments undertaken by the resettlement expert will also include vulnerable groups (including provisions for gender-specific vulnerabilities) as needed.</p>	<p>Ensure that the updated social baseline, SIA, and livelihood restoration process properly account for impacts and remediation measures for identified vulnerable groups/persons.</p>	1.1 5.2
5.4	<i>Compensation for displaced persons</i>	PC	<p>Please see PR 5.1.</p> <p>A livelihood restoration process has been initiated in February 2024 by a local resettlement expert. They will develop an LRP that includes measures for compensation in line with the requirements of PR5.</p>	<p>Develop a compensation strategy for eligible PAPs and provide to the resettlement expert and/or ERM for review.</p> <p>Implement the measures for compensation and/or remediation as per the LRP.</p>	1.1 5.2
5.5	<i>Grievance mechanism</i>	PC	<p>Although a grievance mechanism for stakeholders and PAPs has not yet been developed, an SEP is currently being developed, which will include a proper grievance mechanism to address concerns and grievances pertaining to PR5.</p>	<p>Implement the grievance mechanism (please refer to PR10). Communicate the use and modes of access to stakeholders and the local community.</p>	5.1

PR5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

				Ensure that the LRP references how/where to use and access the grievance mechanism and that there are sufficient protocols in place for remediation as needed.	
5.6	<i>RAP/LRP documentation, implementation and monitoring of process</i>	PC	<p>Please refer to PR 5.4 above.</p> <p>The LRP will include requirements for monitoring and documenting processes, activities, impacts, consultations etc. It shall also include cut-off dates, requirements for eligibility, specifications pertaining to compensation and remediation, as well as any other benefits or support mechanisms for affected persons.</p>	Develop and implement the LRP.	5.2

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
6.0	<i>Desktop studies</i>	PC	<p>Desktop studies in accordance with EBRD requirements were not undertaken within the scope of the existing EIA.</p> <p>ERM has been tasked for the desktop assessment.</p>	A high level, rapid desktop assessment should be done using publicly available global datasets and indicators, most importantly the Integrated Biodiversity Assessment Tool (IBAT: https://www.bat-alliance.org) to inform which aspects of biodiversity (e.g. faunal groups) should be the focus of further biodiversity surveys.	1.1 6.1
6.1	<i>Baseline and impact assessment</i>	PC	In 2022, an "Ecosystem Assessment Report " was compiled by academic researchers, focusing on the mammals, birds, herpetofauna, flora and vegetation. In addition to this during 2022 autumn and	Determine and map the Project Area of Influence (AoI) to establish the biodiversity receptors. The AoI needs to be explicitly defined. This should be undertaken using	6.1

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

		<p>2023 spring migration period bird observation were undertaken and reported as "Ornithological Assessment Report, Autumn 2022" and "Ornithological Assessment Report, Spring 2023. All investigations are evaluated in the EIA report.</p> <p>According to the baseline studies that conducted in the scope of the EIA, the proposed solar power plant area and its close vicinity are covered by a combination of natural and modified habitats. While no aquatic environments were identified within the project area, the closest wetland is Uluborlu Dam which is 1.6 km away from GES-2. The vegetation structure of the area is covered by steppe, grasslands, woodlands consisting of <i>Pinus nigra</i>, <i>Juniperus excelsa</i>, oaks species and rose and cherry orchards.</p> <p>Whilst there were no threatened mammal species identified in the Ecosystem Assessment Report (2022), <i>Testudo graeca</i> (VU: Vulnerable), <i>Streptopelia turtur</i> (VU: Vulnerable) and <i>Neophron percnopterus</i> (EN: Endangered) were identified as threatened species globally in accordance with the IUCN Red List.</p> <p>To determined bird migration activities, during autumn 2022 and spring 2023 migration periods birds' observation were carried out. Total of 50 days (25 in autumn, 25 in spring) observation were completed in three observation points. As a result of observations while there were some resident and transit bird species recorded, no significant migration activities were observed over the project area.</p>	<p>GIP (Good International Practice) guidelines.</p> <p>Complete the necessary biodiversity baseline surveys and data collection to inform the impact assessment studies.</p>	
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PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

According to the existing EIA report there were eight endemic plant species recorded.

The proposed project is overlapping with Barla Mountain KBA which supports restricted-range plant species. In addition, Karakuyu Reeds KBA-IBA which have protected area status in terms of Turkish legislation is about 10 km away from the footprint of planned solar panel area. KBAs are included in the grouping of "internationally recognized areas" for which it will be necessary to screen for potential critical habitat in terms of the PR6 requirements.

Whilst the conducted baseline studies presented footprint of the planned solar power plant site, it should be important that to understand the area in the accordance with not only direct impact area but also indirect impact area. Ad hoc it should be defined AoI and to conduct desktop studies. After using IBAT to understand focal faunal groups requiring surveys and determining the Project AoI, the biodiversity structure should be investigated to understand sensitivity of the area within spatial range of impact area for the construction and operation activities. The footprint of the project area (GES-1) intersects with the KBA, albeit slightly, and it is therefore important to consider the species and habitat which triggered area as a KBA during the field surveys as well.

Biodiversity baseline data collection (terrestrial flora, habitat, vegetation, and terrestrial fauna) and impact assessment studies will be initiated in May 2024 to cover the identified gaps during this ESDD. ERM

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

			has been engaged to coordinate the field surveys and consolidate the baseline data.		
<i>Habitat assessment</i>	PC		<p>Habitat types have not been identified and mapped in the Project Area according to an applicable classification system. The loss and fragmentation of habitat can be a significant impact for solar projects in general.</p> <p>ERM has been engaged to conduct the required habitat assessment.</p>	<p>Develop a habitat map according to the European Nature Information System (EUNIS). This can be a largely desktop (remote-sensing) exercise in GIS, with field verification of representative habitat types and status/condition. The loss and fragmentation of habitat can be a significant impact and this should be quantified in terms of the existing and estimated post-development habitat extent and condition.</p>	6.2
<i>Critical habitat</i>	PC		<p>According to the EIA, it was determined that the Project area and its close vicinity have natural habitat compositions. The Project area covers forest, steppe and meadow habitats which may qualify as critical habitat as well as having PBFs (Priority Biodiversity Features). However, critical habitats and PBFs have not been identified for planned solar plant area considering the criteria of EBRD PR 6. An assessment is therefore required (Rapid Critical Habitat Assessment).</p> <p>EBRD PR6 also requires an assessment Priority Biodiversity feature (PBFs) in addition to critical habitat. This should be included in the RCHA.</p> <p>ERM has been engaged to conduct the RCHA.</p>	<p>Undertake a formal Rapid Critical Habitat Assessment (RCHA) (as per EBRD PR6 guidance regarding CHA).</p> <p>If critical habitats are identified and could be impacted directly, indirectly, or cumulatively, a BMP (Biodiversity Management Plan) needs to be compiled to address 'no net loss' or 'net gain' biodiversity objectives based on the risk of impacting these areas and contributing to residual impacts to critical habitat and/or associated qualifying species or other biodiversity values.</p> <p>An assessment of the need and desirability of a biodiversity offset (for habitat and/or species) may be warranted, depending on the outcomes of the CHA. This needs to be understood in terms of meeting no net loss or net gain objectives for the project. In line with EBRD PR6, the following needs to be implemented where critical habitat is identified the client will not implement any</p>	6.2

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

			<p>project activities unless all of the following are demonstrated:</p> <ul style="list-style-type: none"> For critical habitats, no further fragmentation conversion or degradation to take place; and No project activities are permitted in critical habitat unless certain specific conditions of PR para 15 first met. <p>A robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the clients' management program.</p>	
<i>Ecosystem services</i>	PC	<p>Ecosystem services, and impacts thereon, are not addressed in the EIA report.</p> <p>ERM has been tasked to conduct a biodiversity impact assessment including a rapid and high-level assessment of ecosystem services.</p>	<p>Ecosystem services will be assessed at a rapid/high level in coordination with the social assessment to develop an appropriate baseline on which the assessment of risks/impacts can be based.</p>	6.2
<i>Invasive alien species</i>	PC	<p>An invasive species assessment is lacking from the EIA studies.</p> <p>The desktop study in the EIA report does not state whether there are any invasive species likely to be present on the project site.</p> <p>ERM has been engaged to undertake the biodiversity impact assessment which will also cover invasive species identified during field surveys of habitats and vegetation in May 2024.</p>	<p>An assessment of invasive species risks/impacts and potential pathways for introducing invasive/alien plant or animal species to the site needs to be undertaken.</p> <p>Include specific recommendations for managing and monitoring invasive species as part of an invasive species control program to be developed, particularly for the construction phase when foreign materials and workers will enter the site.</p>	6.2

PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

<i>Biodiversity Management Plan</i>	PC	<p>The EIA report does not include a Biodiversity Management Plan.</p> <p>A comprehensive Biodiversity Management Plan should be developed and implemented for both the construction and operation phases including appropriate and site-specific mitigation and monitoring measure based on the results of the RCHA and biodiversity impact assessment.</p> <p>The plan will include a clear representation of role and responsibility, auditing and reviewing process and a reporting commitment.</p>	Develop a Project specific Biodiversity Management Plan (BMP) covering both construction and operation phases.	6.3
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PR8: Cultural Heritage					
PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
8.1	<i>Assessment and Management of Impacts on Cultural Heritage</i>	PC	<p>The EIA states that on 13.01.2022 the Antalya Cultural Heritage Preservation Regional Board Directorate engaged in an on-site inspection and identified a cultural asset within the scope of Law No. 2863 along two of the Project routes. These areas were deemed as unsuitable for the development of a solar plant, thus, GES-1 and GES-2 were revised to account for the protected areas. The EIA states that after the areas were revised to consider these cultural assets “an opinion of uniformity was received” and additional studies were carried out in accordance with the second opinion letter that was received from the Antalya Cultural Heritage Preservation Regional Board directorate on 13.10.2022.</p> <p>On 01.02.2022 the General Directorate for the protection of Natural Assets (a member of the EIA commission) stated that the project area is not within any borders of the special environmental protection zone.</p> <p>Based on the EIA, ERM understands that intangible cultural heritage has not been included nor evaluated as part of the EIA. An additional social baseline and SIA to expand upon the ESIA process was initiated in February 2024 and shall include assessment of intangible cultural heritage.</p> <p>There is no evidence of a cultural heritage management plan or chance find procedure.</p>	<p>Develop a Cultural Heritage Management Plan (CHMP), – including provisions for the protection of both tangible and intangible cultural assets during all Project phases.</p> <p>Develop a comprehensive Chance Finds Procedure (CFP) to ensure that sufficient protocols; the CFP will complement the requirements stipulated by the experts from the Museum Directorate.</p> <p>Ensure the CFP is communicated to and shared with all contractors.</p> <p>Integrate findings on the changes to GES-1 and GES-2 in the ESIA chapter on Project alternatives for clarity, including maps showing the previously suggested coordinates and current coordinates.</p>	8.1

PR8: Cultural Heritage				
8.2	<i>Consultation with affected communities and other stakeholders</i>	PC	Affected persons/communities and other stakeholders were not consulted on their use of cultural heritage assets. There was no interaction to fill the understanding of potential intangible cultural heritage assets in the Project area, either. Thus, stakeholder inputs on the potential impacts to areas/sites of cultural importance have not been considered.	During stakeholder engagement activities, there should be additional measures to ensure that the project will not pose adverse impacts to the local communities' sites of cultural heritage (tangible and intangible). The engagement should find out what their usage and dependency on these sites are and where impacts cannot be avoided shall be mitigated.
8.3	<i>Project use of Cultural Heritage</i>	N/A	The Project does not propose to use the cultural resources, knowledge, innovations or practices of local communities for commercial purposes.	

PR10: Information Disclosure and Stakeholder Engagement

PR Ref.	Performance Requirement	Score	Comments/Issues	Actions Required	ESAP Ref.
10.1	<i>Stakeholder Engagement Plan</i>	PC	<p>The client has developed a Stakeholder Engagement Plan (SEP) as part of the EIA. It provides a framework of objectives and principles but no evidence of actionable protocols and activities.</p> <p>This SEP for EIA has not identified nor documented stakeholders, conducted a stakeholder mapping and analysis exercise, nor does it identify disadvantaged or vulnerable groups who may be affected by the Project.</p> <p>There is no action plan for engagement activities as part of the EIA and throughout the life of the project, timelines, nor are findings from the social baseline or SIA incorporated.</p> <p>There is no stakeholder database nor stakeholder engagement register/ log.</p> <p>An updated SEP is currently being prepared and will include a GM (community and workforce GM). The SEP will specify requirements for the client to sufficiently carry out, document, track, evaluate and report on engagement activities with stakeholders, including provisions for vulnerable groups.</p>	<p>Develop SEP for the project including stakeholder identification and analysis (including vulnerable groups), summary of past engagement carried out and an engagement plan to guide all future engagement, before construction begins.</p> <p>Develop and maintain a stakeholder database, and stakeholder engagement log.</p>	10.1
10.2	<i>Operational Grievance Mechanism</i>	PC	<p>The client has included a framework for the Grievance Mechanism for external stakeholders in the EIA, however it does not include specific mention of provisions for community vs workforce grievance</p>	<p>Develop project specific community grievance mechanism and raise awareness of the process in all affected communities.</p>	10.1

PR10: Information Disclosure and Stakeholder Engagement

			<p>mechanism. It includes general principles rather than a clear set of actions, definitions, timelines, and designated organizational capacities.</p> <p>SEP is under development and will include a Grievance Mechanism (GM) that includes both a Community Grievance Mechanism and workforce grievance mechanism. It will explain the protocol for submitting, addressing, and responding to grievances. It will clearly indicate what constitutes eligible and ineligible grievances and how all stakeholders and Project proponents are expected to use the GM. It will also allow for the submission of anonymous grievances and the monitoring procedures.</p>	<p>Establish two separate grievance registers/databases to file and process community and workforce grievances separately.</p> <p>Create a commitment register to document and track agreements made to stakeholders and ensure that they are fulfilled in the agreed upon time frames.</p>	
10.3	<i>Information Disclosure</i>	PC	<p>The EIA has been disclosed publicly and the project announced in national and local provincial newspapers.</p> <p>The client has achieved a public benefit decision favoring the Project, however, this only refers to expropriation and land acquisition rather than disclosing all Project information and specificity on risks, impacts, opportunities, and potential benefits to stakeholders.</p>	<p>Upon completion of the social baseline and SIA, the Client will communicate the relevant and key findings to stakeholders.</p>	10.3
10.4	<i>Meaningful Consultation</i>	PC	<p>A public participation meeting was held in the İleydağı Village Meeting Hall of the Uluborlu District. The aim of the meeting was to inform locals of the Project's expected activities during construction and operation and provide the opportunity to ask the project owners and company supporting the EIA.</p>	<p>Conduct further engagement with stakeholders as part of social baseline development and social impact assessment.</p> <p>Conduct engagements as part of the livelihood restoration process.</p>	10.3

PR10: Information Disclosure and Stakeholder Engagement

			Engagement was also conducted during a site visit with the Mukhtar (village headman) where concerns were raised regarding access to grazing land.	Conduct regular engagements with community members during construction and operation. Document all engagements in an engagement log.	
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APPENDIX A DOCUMENTS REVIEWED



Documents reviewed up to 20.11.2023

Document name

- Uluborlu GES KK (pdf)
- Uluborlu GES coordinate list (xls)
- Üretim lisansı (pdf)
- Uluborlu Hibrit GES Taslak Genel Yerleşim Planı (dwg)
- Uluborlu GES (local EIA), (pdf)
- EPDK Kamulaştırma planı (pdf)



APPENDIX B PHOTOS



ERM





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FIGURE 3-1 PHOTOGRAPHS OF THE PROJECT AREA



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

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