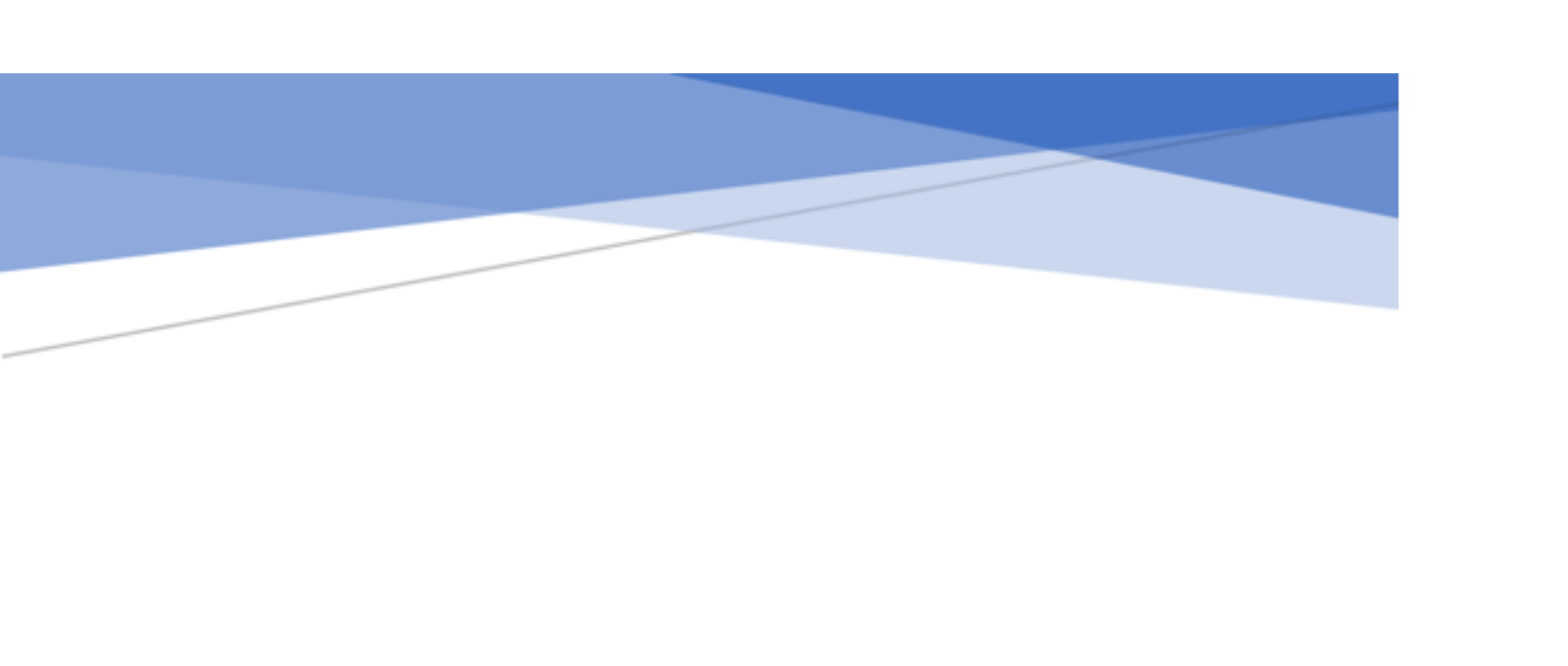




EFELER GPP CAPACITY EXTENSION PROJECT STAKEHOLDER ENGAGEMENT PLAN

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Abbreviations

AIIB	Asian Infrastructure Investment Bank
AYÇEP	Aydın Environment and Culture Platform
BSTDB	Black Sea Trade and Development Bank
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ETL	Energy Transmission Lines
GERÇED	Germencik Environment and Nature Association
GPP	Geothermal Power Plant
JESDER	The Association of Geothermal Electrical Plant Investors
MoEU	Ministry of Environment and Urbanization
NTS	Non-Technical Summary
PAP	Project Affected Persons
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
TEIAS	Turkish Electricity Transmission Company
TMMOB	Turkish Engineers and Architects
UNECE	United Nations Economic Commission for Europe
WWF	World Wildlife Fund

1. Introduction

1.1. Overview

This Stakeholder Engagement Plan (SEP) is prepared for the the Efeler Geothermal Power Plant Capacity Extension Project (the “Efeler GPP Project” or the “Project”) of the existing Gurmat-2 GPPs. Currently, Gurmat-1, Gurmat-2 GPP and Efe-6 and Efe-7 units of Efeler GPP Capacity Extension Projects are in operation, also, Efe – 8 GPP has secured Electricity Generation License. The Project is planned to be constructed and operated by Gurmat Elektrik Uretim A.S. (“Gurmat Elektrik”, “Project Company”). Gurmat is a sub-company of Mogan Enerji, an investment holding established by Guris Holding for group’s investments in the energy sector.

This SEP has been developed by the Company as a public document, to present plans for stakeholder engagement, consultation and disclosure in line with the environmental and social policies of the Company, international standards and lenders’ requirements. The SEP is a live document, which is to be updated for each phase of the Project and as needed.

1.2. Who are we?

Guris Insaat ve Muhendislik A.S. (“Guris”) was established in 1958 as Guris Kolektif and has been conducting its activities in construction, industry, energy, tourism and mining sectors. Mogan Enerji Yatirim Holding A. S. (“Mogan”), Guris’ affiliate for energy developments, aims to become a leading energy generation company in Turkey through renewable energy projects. In line with this goal, Mogan is currently operating multiple geothermal power plants (GPPs), wind power plants and hydroelectric power plants, and a multitude of other Mogan renewable energy projects are either under construction or in development. Mogan’s geothermal energy developments are executed by the Project Company which was established in 1999. It is currently operating one of the biggest and most efficient GPP in Turkey, referred to as Gurmat-2 GPP, in Germencik district of Aydin province.

1.3. Purpose of this Stakeholder Engagement Plan

The main goal of this SEP is to ensure that project-affected people and other interested stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts. Stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders,
- generate a good understanding of the Project among those that will be affected,
- identify issues early in the project cycle that may pose risks to the Project or its stakeholders,
- ensure that mitigation measures are appropriate (implementable, effective and efficient),
- establish a system for long-term communication between the Project and communities that is of benefit to all parties.

The main purposes of this document are to:

- define a consultation approach for stakeholders in relation to construction and operation of the Project,
- identify resources and responsibilities for implementation and monitoring of the consultation program,
- set up a grievance mechanism for the stakeholders, including a process to address views and concerns.

Gurmat is committed to continue communicating openly and actively with workers, communities and governmental/non-governmental organizations on all topics in all Project related activities including the capacity extension works. This SEP has been designed to meet the Project Company’s corporate policies and standards, in line with applicable national legislation, European Bank for

Reconstruction and Development (EBRD) Environmental and Social Policy. The SEP will also guide the Company towards implementing a structured stakeholder consultation and engagement during all stages of Project implementation. This includes construction, operation and decommissioning of the GPPs.

The ultimate purpose of this SEP is to establish and maintain constructive relationships with the local community and other interested stakeholders that are essential for the successful management of the Project's environmental and social impacts. The Project Company is fully committed to undertaking necessary engagement activities related to the Project in a manner that is consistent with international good practice as outlined in next sections. This SEP should be read in conjunction with the ESIA, ESMMP and other project documents.

1.4. Structure of the SEP

Contents of this SEP include the following:

- Project description,
- Key environmental and social issues,
- Public consultation and information disclosure requirements,
- Identification of stakeholders and other affected parties,
- Overview of previous stakeholder engagement activities,
- Stakeholder engagement programme and methods of engagement,
- Grievance mechanism,
- Resources and responsibilities, and
- Monitoring and Reporting

2. Project Information

The Project is located in Germencik district of Aydin province. At the Project location, Gurmat A.S. has been operating the existing 47.4 MWe Gurmat-1 GPP since 2009 and 114.9 MWe Gurmat-2 GPP (consists of Efe-1, Efe-2, Efe-3 and Efe-4 GPPs) since 2014. The Capacity Extension Project will utilize deep geothermal waters for energy generation and consists of 3 binary type GPPs, providing a total installed capacity of 97.6 MWe:

- Efe-6 GPP, 22.6 MWe installed capacity, located adjacent to southern border of Gurmat-1 GPP
- Efe-7 GPP, 25 MWe installed capacity, located adjacent to southern border of Efe-2 GPP
- Efe-8 GPP, 50 MWe installed capacity, located adjacent to the southern border of Efe-1, Efe-3 and Efe-4 GPPs' site

Electricity Generation License for Efe-6 GPP and License for Efe-7 GPP and Efe-8 GPP were obtained in 2019. In addition, an Environmental Impact Assessment (EIA) process, in line with the national EIA Regulation was conducted separately for each unit of the Project and "EIA Positive Certificates" were obtained in 2016 for Efe-6 and in 2017 for Efe-7 and Efe-8. The SEP for Gurmat-2 (Efe-1, Efe-2, Efe-3 and Efe-4) is already in place.

2.1. Project Background

The Project GPPs are situated 19-20 km west of the Aydin city center, in Germencik district. The Project GPP locations and the closest settlements are provided below:

Distance of Efe-6, Efe-7 and Efe-8 GPPs to the nearby settlement centers are provided in Table 1 and General Layout of the Existing Gurmat Facilities and Planned Capacity Extension Plants is presented in Figure 1.

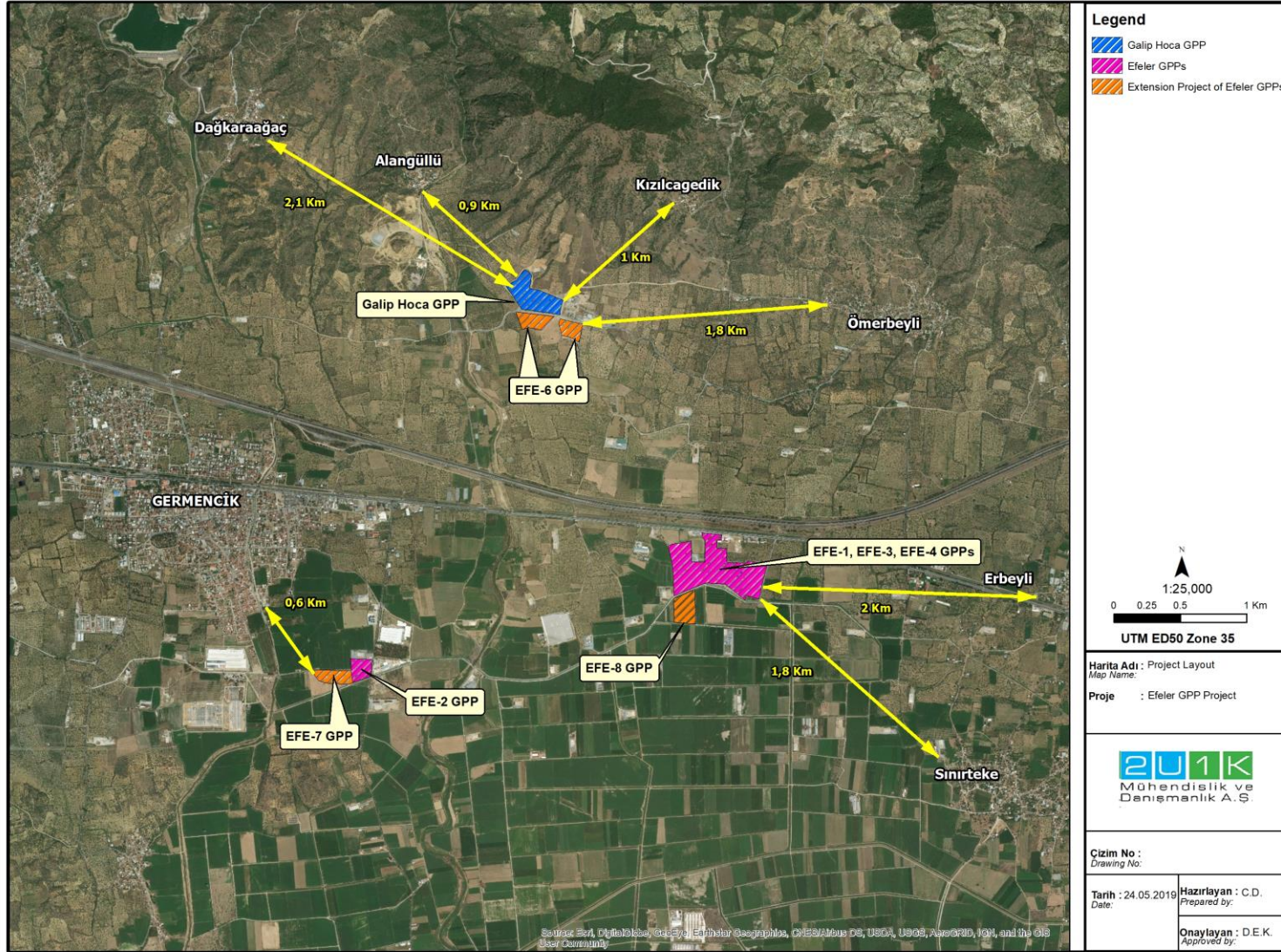
Table 1. Distance (km) of the Project to Surrounding Settlement Centers

Capacity of GPP	Efe-6 GPP 22.6 MWe 180.8 GWh	Efe-7 GPP 25 MWe 200 GWh	Efe-8 GPP 50 MWe 400 GWh
Aydin city center	19.0	20.0	18.0
Germencik district center	3.0	1.6	3.7
Incirliova district center	7.8	10.5	9.0
Omerbeyli neighborhood	2.3	5.0	2.5
Kizilcagedik neighborhood	1.9	4.5	3.0
Alangullu neighborhood	1.5	3.8	3.7
Turanlar neighborhood	5.5	2.9	3.9
Sinirteke neighborhood	5.0	5.5	3.0
Erbeyli neighborhood	4.2	5.8	3.0
Akçeşme neighborhood	3.6	6.3	3.8

The Project consists of exploration, construction, operation and closure phases. As of May 2019, Efe-6 and Efe-7 are in operation; and construction is ongoing for Efe-8.

The main and associated units of the Project and their functions are: Production and Reinjection Wells, Pipelines, Power Plants, Switchyards, Energy Transmission Lines (ETL), Emergency Ponds and Fire Systems.

Figure 1: General Layout of the Existing Gurmat Facilities and Planned Capacity Extension Plants



2.2. Status of the Project

The existing Gurmat-2 GPPs in operation are Efe-1, Efe-2, Efe-3 and Efe-4 GPPs, whereas the Project under consideration for financing by the European Bank for Reconstruction and Development (the “EBRD” or the “Bank”), the Asian Infrastructure Investment Bank (“AIIB”), Black Sea Trade and Development Bank (“BSTDB”), Türkiye İş Bankası (“İSBANK”) and Türkiye Sanayi ve Kalkınma Bankası (“TSKB”) (together “the Lenders”) consists of Efe-6, Efe-7 and Efe-8 GPPs, of which Efe-6 GPP is in operation since August 2017, Efe-7 GPP is in operation since October 2018 and Efe-8 GPP construction was initiated in 2018. The construction works for Efe-8 GPP have been temporarily suspended between July 2018 and December 2018 due to legal proceedings against the EIA approval initiated by the Aydın Environment and Nature Association (Aydın Çevre ve Doğa Derneği). The relevant EIA approval was reinstated by 14th Division of the Republic of Turkey Presidency of the Council of State dated December 27, 2018 (Docket No. 2018/5091 Decision No. 2018/8330), since when construction was restarted. All land parcels required for the Project are acquired; and land acquisition is complete.

2.3. Status of the Environmental Impact Assessment (EIA) permitting process

The approval for the EIA Report of Efe-8 GPP was initially issued in June 2017, and then cancelled as per Docket No. 2017/759 Decision No. 2018/886 of the 2nd Administrative Court of Aydın in consequence of the request of Aydın Environment and Nature Association (Aydın Çevre ve Doğa Derneği). The arguments put forward by Aydın Environment and Nature Association for cancellation of the EIA Approval were as follows:

- “the EIA Approval is not in compliance with:
 - The Constitution of the Republic of Turkey, Articles 17 and 56,
 - The Environmental Law No. 2872 ratified in August 1983, Articles 9 and 10,
 - The Regulation on Environmental Impact Assessment (dated November 25, 2014; No: 29186 and amended on June 14, 2018; No: 30451), Article 14,
- The Project has impacts on the olive groves and general environment (i.e. soil pollution), agricultural areas (e.g. olive groves and fig trees) and water resources (e.g. rivers) located in the relevant geographical area; and
- The administrative act of granting the EIA Approval is against the public interest and therefore, should be cancelled.”

Yet, the recent decision of the 14th Division of the Republic of Turkey Presidency of the Council of State dated December 27, 2018 (Docket No. 2018/5091 Decision No. 2018/8330) has abolished the decision of the 2nd Administrative Court of Aydın relating to cancellation of the approval for the EIA Report and reinstated the Environmental Permit for the Efe-8 GPP Project. Furthermore, the judgment of the Presidency of the Council of State does not comprise any decisions to stop execution of the construction works until the resolution of the court case. Accordingly, the EIA Approval of the Ministry of Environment and Urbanization is effective, and therefore, Gurmat Electric can proceed with the construction works. In this respect, the dispute must be reconsidered

by the 2nd Administrative Court of Aydın and a new verdict must be rendered. On that account, an additional expert examination report is required to be prepared in relation to the potential effects of the Efe-8 GPP on the olive groves and fig trees and the determination of the distance between the Project site and olive groves as well as the evaluation of the Project's compliance with Law No. 3573 on Olive Improvement and Grafting of Wild Species (Official Gazette No. 4126, 07.02.1939). In other words, a new process regarding "re-examination of the files with respect to the additional expert examination report" should be started in the 2nd Administrative Court of Aydın.

According to the information provided by Gurmat Electric, a new EIA process for Efe-8, which had been started with a new consultant (Cinar), was stopped after the reversal decision of the 14th Division of the Presidency of the Council of State due to the fact that there is no need for a revised EIA Report or process as per the decision of the Council of State. Yet, Gurmat Electric already has an assessment report in place about the impacts of geothermal power generation on olive production, which was prepared as an annex to the prospective revised EIA Report. In addition, a hydrogeological investigation report has been prepared for the prospective revised EIA Report.

2.4. ESIA Scoping Study

The objective of the ESIA Scoping study was to identify Project's stakeholders, depict key social issues (including labor and working conditions) and environmental issues, assess Client's environmental and social management system against Lender's requirements, review past stakeholder engagement activities including Project's grievance mechanism, and evaluate Project's past land acquisition.

The scoping study comprised of desktop document review and a field study. Field study included meeting with the Project owner with respect to management of social and environmental issues, review of available material at site; in addition to qualitative field data collection. Consultations and in-depth interviews with Public stakeholders, NGOs, Project Affected Person (PAP)s were held to understand key social and environmental impacts, level of Project's stakeholder engagement and information disclosure; and assessment of Project's grievance mechanism.

Between the dates March 12th -14th 2019 field study for Scoping Report of Efeler GPP ESIA was conducted. During the site visit, interviews with the local institutions and stakeholders were conducted in order to further depict the key social impacts of the Project; and identify the stakeholders. The list of the interviewed stakeholders is shown below in Table 2.

Table 2. Key Informant Interviews

Non-Governmental Organizations	Local Authorities
1. Aydın Bar Association President	1. Aydın Province Deputy Governor
2. Aydın Bar Association Environment Committee President	2. Aydın Province Retired Deputy Governor
3. Aydın Center Yörük Türkmen Association	3. Aydın Public Hospital Head Physician
4. Efeler Chamber of Agriculture President	4. Turanlar Neighborhood Mukhtar
5. Germencik Chamber of Agriculture President	5. Hidirbeyli Neighborhood Mukhtar
6. Agricultural Credit Cooperative President	6. Alangullu Neighborhood Mukhtar
7. Germencik Şehit Cafer Efe Yörük Türkmen Association	7. 3 Fig Producers
8. İncirliova Chamber of Agriculture President	8. Germencik District Governor
	9. Germencik Fig Research Institute
	10. İncirliova Mayor
	11. Sinirteke Neighborhood Mukhtar

Non-Governmental Organizations	Local Authorities
	12. İncirliova Denizbank Private Bank Branch Manager
	13. İncirliova District Governor
	14. İncirliova District Agriculture Director

The key issues raised by stakeholders are related to the cumulative impacts of Geothermal Power Plants. Their concerns are associated with potential damage to the environment (land, water contamination), worsening air quality (especially pertaining to odor), potential impact on community health and decrease in fig and olive production which may lead loss of livelihoods.

Project has devised mitigation and monitoring mechanisms in order to avoid/reduce/mitigate Project's potential adverse impacts. Stakeholder's concerns on Project's potential impact on environment are addressed in detail at NTS1; additional measures to mitigate the gaps are included in Project's ESAP. Moreover, as the Project GPPs are located adjacent to existing Gurmat GPPs, need for construction of multiple additional access roads is eliminated, resulting in decreased associated impacts in terms of environment and especially occupational and community health and safety.

Public level stakeholders and NGOs consulted during scoping field emphasized the importance of continuous information sharing, and regular consultations. This SEP is based on stakeholder consultations; and their demand for regular engagement, and information sharing is incorporated in SEP design.

2.5. ESIA Addendum

The EBRD has financed the development of the existing Efeler Geothermal Power Plants for which a separate Environmental Impact Assessment (EIA) Addendum and Social Impact Assessment (SIA) Reports were developed in 2014 by WS Atkins International Ltd and disclosed on the EBRD's and the Project Company's websites .

Due to the scale and cumulative impacts of the Efeler GPP Capacity Extension Project, it was categorized as Category A according to the EBRD Environmental and Social Policy (2014), which is also adopted by the other members of the Lenders' group for the purpose of appraising and monitoring the Project. The Company commissioned AECOM Turkey Danışmanlık ve Mühendislik Ltd. Şti. ("AECOM") in 2017 to develop additional supplementary environmental and social studies to meet the EBRD PRs and international good practice for the Efeler GPP Capacity Extension Project, following a review of the regulatory EIA Reports prepared to meet the national requirements for Efe-6, Efe-7 and Efe-8 GPPs. The corresponding Environmental and Social Impact Assessment (ESIA) Addendum – including an Environmental and Social Management Plan (ESMP), Stakeholder Engagement Plan (SEP) and Non-Technical Summary (NTS), were prepared and disclosed in 2018 (the "2018 Disclosure Package").

¹ NTS section 3 describes in detail potential adverse impacts on air quality (3.1), water quality (3.2), noise (3.3), waste management (3.4)

2U1K Mühendislik ve Danışmanlık A.Ş. (“2U1K” or “the Consultant”) has been engaged by the Company to address the concerns expressed by stakeholders and raised in the course of the legal proceedings in late 2018 and early 2019 by carrying out a further Environmental and Social Assessment (ESA), including a gap analysis of the previous and current environmental and social documentation relevant to the Project against the EBRD requirements, and reflect the additional studies conducted by Guris since the 2018 Disclosure Package (this “Assignment”). In line with the EBRD’s Environmental and Social Policy (2014), which is also adopted by the other members of the Lenders’ group for the purpose of appraising and monitoring the Project, the objectives of this Assignment are to critically assess the stakeholder engagement activities and plans of the Project against these requirements in general and Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement in particular. This includes, for the initial phase of the Project (Efe-1, Efe-2, Efe-3, and Efe-4 GPPs), and construction/operation of the Expansion Project’s facilities and associated facilities (Efe-6, Efe-7 and Efe-8 GPPs). Accordingly, any gaps in the existing documentation and processes relative to the EBRD requirements have been clearly identified, and how the identified gap(s) could pose a risk to the Project, have been substantiated.

3. Regulatory Requirements of Stakeholder Engagement

The SEP itself has been prepared in compliance with, and stakeholder engagement activities identified in this SEP will conform to the following legislation and standards:

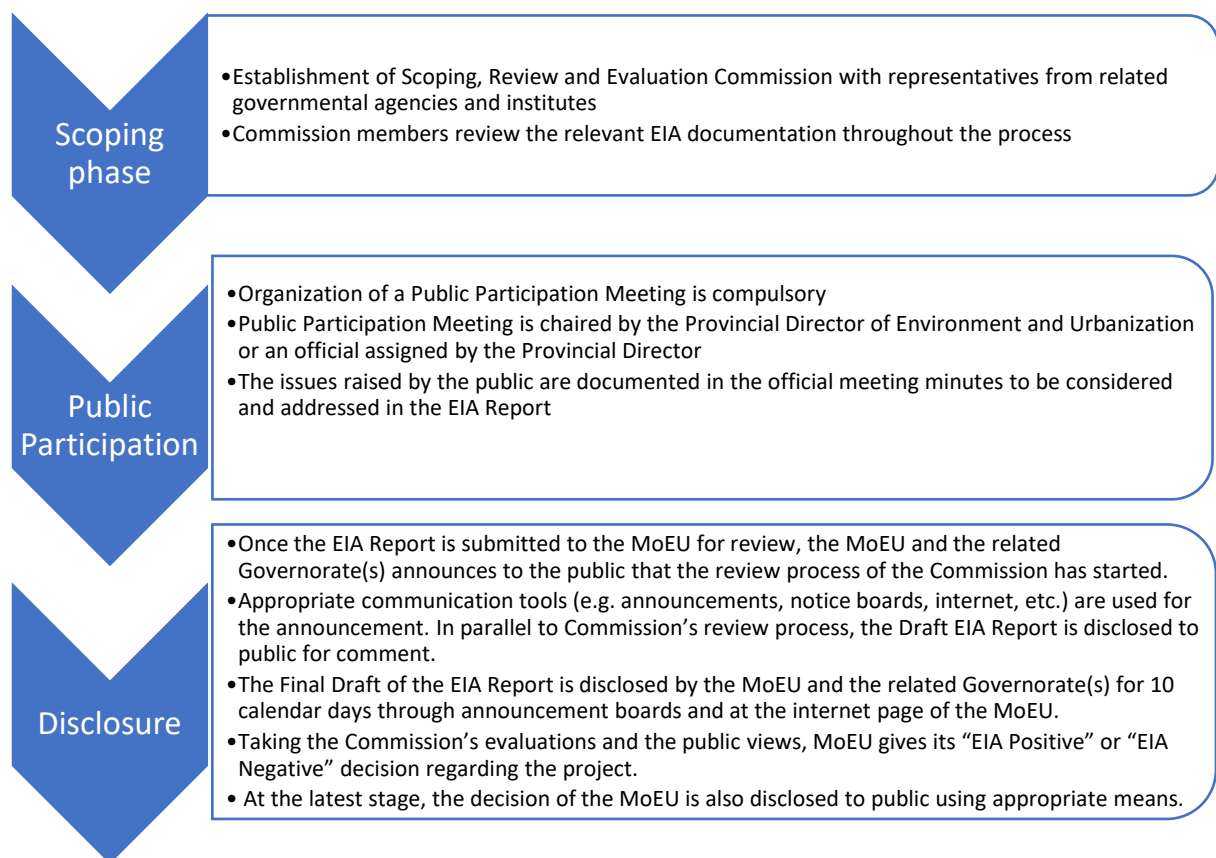
- Relevant Turkish national legislation
- EBRD's Environmental and Social Policy and the associated Performance Requirement (PR) 10 (2014)

Further details of the relevant Turkish legislation and applicable international requirements are provided in the following sections.

3.1. National Requirements

Under the scope of the current Turkish EIA Regulation (published in the Official Gazette dated 25 November 2014 and Numbered 29186), several references are made to information disclosure and stakeholder participation. Public participation to EIA process is a legal obligation for the project owner as per the 1st clause of Article 9 of the EIA Regulation.

Figure 2: Turkish national legislation for Public consultation



3.2. International Requirements

The main applicable international standard for the Project, EBRD's performance requirements, agree with the approach of the United Nations Economic Commission for Europe (UNECE) Aarhus Convention, which identifies the environment as a public good and considers stakeholder engagement as an essential part of good business practices, corporate citizenship, and a way of improving the quality of projects.

In addition, EBRD requires that the project it supports conforms with the purpose and goals of the Aarhus Convention. This Convention assures the rights of access to information, public participation in decision-making, and access to justice in environmental matters, therefore protecting people's rights to a healthy environment.

Within this scope, The Project Company will conform to EBRD disclosure and stakeholder engagement requirements as outlined in EBRD's PR 1 and 10:

PR 1

- The Project Company will, as an integral part of the assessment process, identify the Project's stakeholders and design a plan for engaging with the stakeholders in a meaningful manner to take their views and concerns into consideration in planning, implementing and operating the project in accordance with PR 10 (below).
- Dynamic process of performance monitoring and evaluation, including the monitoring of stakeholder feedback, the local community or inspections by regulatory authorities; and
- Regular reporting to EBRD on stakeholder engagement during project implementation.

PR10

- Project Company will 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.
- Stakeholder engagement will 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.
- The nature and frequency of stakeholder engagement will be proportionate to the nature and scale of the Project and its potential adverse impacts on the affected communities, the sensitivity of the environment and the level of public interest. The requirements of national law with respect to public information and consultation, including those laws implementing host country obligations under international law, must always be met.
- The Project Company will define clear roles, responsibilities and authority as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

4. Summary of Previous Stakeholder Engagement Activities

Stakeholder engagement activities conducted to date includes previous national EIA processes for the Gurmat-1, Gurmat-2 and Capacity Extension Projects:

Gurmat-1, Gurmat-2:

- Turkish EIA Disclosure:
 - In accordance with Turkish law, the Project meeting within the scope of EIA was held on 19.03.2012 in Aydın Province, Germencik District, Umit Wedding Hall (Germencik town).
 - The meeting announcement was placed in two newspapers, one local (published in the province centre and in the districts) and one national. Apart from Gürmat 2 and national EIA consultants, participants of the meeting included representatives of the Ministry of Environment and Urban Planning, Aydın Provincial Directorate of Environment and Urban Planning, the Regional Directorate of State Hydraulic Works (SHW), the District Directorate of SHW, village headmen (mukhtars) and the local community.
- Household Surveys: A household survey was carried out with 75 PAPs for the national EIA studies in spring 2012. From the studies, it was observed that local residents should have informed more directly from Gürmat to receive much more reliable information regarding the Project.
- Key Informant Interviews: Meetings were held with the village headman of Ömerbeyli and the Mayor of Germencik to understand Project's potential social impacts.
- Project Disclosure: Project disclosure package including EIA, SIA, and SEP were disclosed on 24.09.2014 at Gurmat W and EBRD websites.
- As requested by mukhtars of the affected villages, Gürmat started to engage with them on regular basis. A grievance mechanism was established as a result of consultations. Local employment was prioritized accordingly with the local suggestions.

Design changes according to public suggestions:

The works done and/or to be revised in line with public suggestions within the scope of Project activities are presented below.

- In the EIA meeting of the EFE 6 Project, Ömerbeyli villagers stated that the transportation roads between the power plant and the wells during the construction activities and operation phase will cause continuous dust and may place damage to fig trees and agricultural lands since the current road conditions are already insufficient.
 - In line with the aforementioned suggestion, the Company has prevented mitigated potential dusts impacts through covering the cold asphalt surface primarily to the earth roads, main transportation roads, roads between the plant area and the well locations (approximately 3 km).
- During the well tests, the Company collected fluid from the well in the mud pond with membrane approximately 4000-5000 m³ capacity in compliance with relative national legislations. However, the some villagers stated their discomfort on how the discharge water overflow to the fields and there is a concern on animals drinking that water.
 - After the completion of the required process, test water has been recharged to the subjected well.
- Villagers and related local governmental bodies have complaints regarding to route of the above ground pipelines in terms of visual impacts, narrowing the current roads and decrease in the current agricultural land's price.
 - To resolve the mentioned suggestions, re-injection wells have been constructed in underground. Also, Efe-8 re-injection pipelines will be constructed underground when necessary permits from General Directorate of Highways is received.

Currently, Research and Development studies are being conducted in order to construct production pipelines underground.

- Although the amount of H₂S released is below the national legislation limits, the spread of odor creates unpleasant situations and the Company subject to the public reactions.
 - The Company has signed a contract for the ozonation process for Efe 1 GPP as a pilot project. If the odor problem solved with the ozonation process, this method will be applied for Galip Hoca GPP.
- That fencing in agricultural land, where OB21 underground reinjection pipes located, was requested by the mukhtars. The demand was welcomed positively, a total of 2700 mt of fence were placed free of charge.

Capacity Extension Projects

- Turkish EIA Disclosure:
 - In line with the requirements of the Turkish EIA Regulation, Public Participation Meetings were held in locations that are easily accessible for communities identified to be potentially affected by the Efeler GPP Project (Capacity Extension).
 - More than 10 days in advance of the meeting dates, advertisements were published in local and national newspapers to inform the public about the meeting dates and locations in accordance with the provisions of Turkish EIA Regulation. Additionally, announcements were posted at the meeting venues and offices of the neighborhood headmen for the same purpose.
 - The main questions and concerns raised by the participants during the meetings and meeting details are summarized below in Table 3.

Table 3. Public Participation Meetings for Efe-6, Efe7 and Efe-8 GPPs

Project	Meeting	Meeting Date	Main concerns/questions/issues Raised by Participants
Efe-6 GPP	Omerbeyli neighborhood (Wedding Hall)	February 25, 2016	- Details of the operation process to be conducted at the power plant - Air pollution caused by GPP operating in the region - Impacts of air pollutants emitted from these plants on agricultural lands
Efe-7 and Efe-8 GPPs (joint meeting)	Germencik Municipality Conference Hall	December 23, 2016	- Disturbances due to steam emitted from the stacks of the power plants

Source: Efe-6 GPP National EIA Report, August 2016; Efe-7 GPP National EIA Report, April 2017; Efe-8 GPP National EIA Report, April 2017

- Consultations: A meeting was held with the members of the Municipal Council of Germencik in February 2019 as a part of SEP. A tour of the facilities was held during the meeting and the Council members were informed about existing and planned social investments.
- Settlement-level meetings: In order to inform stakeholders on Grievance Mechanism, informative meetings were held in the settlements of Omerbeyli, Turanlar, Erbeyli, Kızılçagedik and Dağkaraağaç. Stakeholder Grievance Form posters were also hung in 8 villages.
- CSR: Also, as a part of Social Responsibility activities support was provided to affected neighborhoods and districts. The detailed and up-to-date list of the assistance can be seen in Appendix A.

5. Stakeholder Identification

In line with the definitions of international standards, this SEP recognizes a stakeholder as any individual, organization or group that is potentially affected by the Project or that has an interest in the Project and its impacts. The purpose of stakeholder identification is to determine and prioritize Project stakeholders for consultation that may be affected (either directly or indirectly in positive or negative way) by the Project or that have an interest in the Project but are not necessarily directly impacted by the Project. As part of the stakeholder identification process, it is also important to identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.

The stakeholders that have been identified as being affected by or potentially interested in the Project are listed in Table 4, whereas a detailed list including contact details of the key stakeholders is given in Appendix B. Organizations or groups which are not listed and wish to be informed about the Project, are invited to contact Project Company (see Chapter 10 for contact details for the public) to add their contact information to the list. This SEP is a living document and will be updated and revised as necessary, including the list of Project stakeholders.

Table 4. Project Stakeholder Groups

Stakeholder Groups	Definitive Stakeholders	Summary of Specific Interest/Relevance
External Stakeholders		
National Governmental Organizations	Ministry of Energy and Natural Resources Ministry of Forestry and Water Affairs (especially General Directorate of State Hydraulic Works) Ministry of Environment and Urbanization Ministry of Culture and Tourism Ministry of Labor and Social Security Ministry of National Education (for education related CSR activities) Energy Market Regulatory Authority	National and regional development Policy formulation Permitting Cumulative impacts
Local Governmental Organizations	Governorship of Aydın (including Provincial Directorate of Environment and Urbanization, Food, Agriculture and Livestock, Culture and Tourism) Germencik District Governorate İncirlioğlu District Governorate Aydın Metropolitan Municipality (including Fire Department) Germencik Municipality İncirlioğlu Municipality Germencik District Directorate of Agriculture İncirlioğlu District Directorate of Agriculture Germencik Gendarmerie İncirlioğlu Gendarmerie Local Police Force Local Emergency and Health Services İncirlioğlu Fig Research Institute Directorate İncirlioğlu City Council	Social and economic development Environmental protection Management of environmental impacts (e.g. wastes, wastewater) Permitting
Public Economic Enterprises	Turkish Electricity Transmission Company (TEİAŞ)	Implementation of infrastructure services Operation and maintenance of Project ETLs

Non-governmental Organizations (NGO's) – international, national and local	Nature Association Environment Foundation of Turkey World Wildlife Fund (WWF) Turkey The Association of Geothermal Electrical Plant Investors (JESDER) Turkey Geothermal Association Aydın Branch Office of Union of Chambers of Turkish Engineers and Architects (TMMOB) Aydın Branch Office of Chamber of Environmental Engineers Aydın Branch Office of Chamber of Electrical Engineer Aydın Branch Office of Chamber of Medical Doctors Aydın Bar Association (including Environmental Commission) İncirliova Chamber of Agriculture Germencik Chamber of Agriculture Aydın Environment and Culture Platform (AYÇEP) Germencik Environment and Nature Association (GERÇED) Aydın Environment Union Germencik Environment Protection Platform Women associations Germencik Association of Mukhtars İncirliova Association of Mukhtars	Environmental and social impacts Cumulative impacts Economic development
Mukhtars/Local Communities/Residents (incl. landowners and/or users)	Germencik district İncirliova district Alangullu neighborhood Erbeyli neighborhood Kizilcagedik neighborhood Omerbeyli neighborhood Sinirteke neighborhood Turanlar neighborhood Akçeşme neighborhood Project affected persons (PAPs) using the License Area for agricultural purposes	Environmental and social impacts Cumulative impacts Land acquisition Employment
Vulnerable persons/groups	The poor/elderly/people with disabilities in the Alangullu neighborhood Erbeyli neighborhood Kizilcagedik neighborhood Omerbeyli neighborhood Sinirteke neighborhood Turanlar neighborhood Akçeşme neighborhood	Environmental and social impacts Cumulative impacts
Women PAPs	Women farmers, Women headed households in Alangullu neighborhood Erbeyli neighborhood Kizilcagedik neighborhood Omerbeyli neighborhood Sinirteke neighborhood Turanlar neighborhood Akçeşme neighborhood	Environmental and social impacts Cumulative impacts Land acquisition Employment
Local Businesses	Local Enterprises	Procurement and service provision opportunities Inward investment
Universities	Aydın Adnan Menderes University Yamanturk Vocational School	Technical Consultancy CSR activities

Local Media	Local newspapers, local television channels, etc. (For example: Aydın Denge Newspaper, Aydın Hedef Newspaper, Aydın Ses Newspaper, TVDEN)	Relaying correct Project information to communities Advertisements
Lenders	International finance institutions (including private banks)	Project finance
Internal Stakeholders		
Company	Employees Contractors and Sub-contractors and their Employees	Growth and development Stable employment and opportunity Occupational health and safety
Company Shareholders	All shareholders	Reputation with regard to Environmental and Social Performance of the Project Business growth and shareholder value

6. Stakeholder Engagement Plan

The Company already has in place a SEP for Gurmat-2 GPPs (Efe-1, Efe-2, Efe-3 and Efe-4). The engagement activities and monitoring system provided in this SEP for the Capacity Extension Project will be implemented during the lifetime of the Project.

To ensure effective and meaningful engagement with different stakeholder groups, the Project Company will use various appropriate methods of communication and information throughout construction, operation and decommissioning phases of the Project. Above all, electronic copies of the Disclosure Package documents and the national EIA is disclosed to public (in Turkish and in English) on the Mogan Enerji web site (<http://www.mogan.com.tr>), as well as the EBRD website (<http://www.ebrd.com> – for the 60 day disclosure period) to allow stakeholders to view information about the planned development and to initiate their involvement in the public consultation process. Documents to be disclosed for Capacity Extension Project include the following: Disclosure Package- National EIA Reports, ESIA Addendum, Non-Technical Summary (NTS), SEP (including the Grievance Procedure), ESAP.

It is envisaged that electronic copies of the above listed documents will remain in the public domain for the duration of the Project and that this SEP will be updated periodically and will remain publicly available on the web-site and in the offices of the Project Company in Turkish.

In addition to electronic copies, hard copies of the documents comprising the Disclosure Package and the national EIAs will also be available at the related Municipalities (Germencik Municipality, İncirliova Municipality), Project site offices and the neighborhood headmen's offices at the selected settlements: Alangullu, Erbeyli, Kizilcagedik, Omerbeyli, Sinirteke, Turanlar and Akçeşme neighborhoods.

Annual environmental and social reports including monitoring data will be prepared and submitted to the Lenders (i.e. EBRD). In this respect, summarizes the type of information to be shared with each stakeholder group and the specific methods for communication/consultation to be used for stakeholder engagement.

Particularly in consultations with and information of the local communities, elected neighborhood headmen ("Mukhtars") will play an important role by enhancing communication between communities and external stakeholders from outside their localities. As required, meetings will be conducted with the headmen and community representatives to inform them about the Project progress.

To engage with the internal stakeholders, including direct employees and the contracted workers, and inform them about the Project developments and internal mechanisms, the following particular methods will be used:

For Employees of Gurmat:

- Internal newsletters, notifications and intranet
- Code of Conduct
- Internal grievance procedure
- Company bulletin boards
- Worker representatives selected by the employees
- Trainings
- Employee grievance process

For temporary construction workers, contractors, subcontractors:

- Bulletin boards
- Code of conduct
- Trainings
- Worker representatives selected by the employees

- Internal grievance procedure

Table 5 summarizes the type of information to be shared with each stakeholder group and the specific methods for communication/ consultation to be used for stakeholder engagement.

Table 5. Stakeholder Engagement Methods and Consultation Frequencies

Stakeholder Group	Consultation frequency	Engagement Methods
National Governmental Organizations	When needed	Electronic publications and press releases on Company website ESIA Disclosure Package and national EIA Reports Regular and on-demand meetings Correspondences and telephone calls
Local Governmental Organizations	Every 6 months stakeholder visits	Regular meetings and stakeholder visits Electronic publications and press releases on Company website Correspondences and telephone calls Site visits
Non-governmental Organizations	Every 6 months	Electronic publications and press releases on Company website Regular and on-demand meetings Correspondences and telephone calls
Business Associations	Annual	JESDER Board Meetings Events/fairs/seminars/conferences organized by the sector
Mukhtars	Every 2 months visits	Electronic publications and press releases on Company website Disclosure Package and national EIA Reports (hard copy) at neighborhood headmen offices, Project office Press releases in the local media for the announcements regarding information events (i.e. community meetings, etc.) Regular and on-demand meetings Leaflets, brochures, information board posts, frequently asked questions & answers Correspondences and telephone calls Procurement and employment announcements at public areas and boards
Farmers (figs) Farmers (olives)	During crop production and harvesting each year	Through monitoring of project/operational impacts on soil and consulting farmers on issues affecting agricultural activities Project grievance mechanism Trainings to the farmers on Emergency response and Community health and safety Potential social investment projects
Women	Every 3 months	Engage women in employment and recruitment processes, social investment projects, emergency response and community safety and security trainings through face to face meetings, leaflets and announcements in villages

Stakeholder Group	Consultation frequency	Engagement Methods
Local communities (including vulnerable groups) in the Project's Impact Area	Systematic Monthly meetings during construction and Quarterly meetings during operation Ad-hoc/needs base meetings if needed	Electronic publications and press releases on Company website Disclosure Package and national EIA Reports (hard copy) at neighborhood headmen offices, Project office Press releases in the local media for the announcements regarding information events (i.e. community meetings, etc.) Regular and on-demand meetings Trainings targeting communities on various aspects including emergency response and community health and safety awareness etc. Leaflets, brochures, information board posts Correspondences and telephone calls Procurement announcements at public areas and boards
Local businesses, recruitment agencies	When needed	Electronic publications and press releases on Company website Leaflets, brochures, information board posts Procurement announcements at public areas and boards Meetings through Chamber of Industry and Trade
Universities	When needed	Electronic publications and press releases on Company website Leaflets, brochures, information board posts Regular and on-demand meetings Correspondences and telephone calls
Local and national media	Yearly stakeholder visits	Electronic publications and press releases on Company website Leaflets, brochures Correspondences and telephone calls Frequently asked questions & answers Meetings and events through Industry Association (JESDER)
Lenders	When needed	Annual environmental and social reports determined in ESAP Electronic publications and press releases on Company website Regular and on-demand meetings Correspondences and telephone calls

Disclosure of the ESIA documentation:

Disclosure of the ESAP, SEP and NTS documents will provide detailed information about the Project activities, assessment of the impacts and the planned mitigation measures and monitoring activities. After submitting the final Project documents to the lenders, it will be advertised and made available for public review. According to EBRD PR-10.

Gurmat Elektrik AS will disclose the following updated documents through Company and EBRD website for 60 days² for public review and comments:

- Stakeholder Engagement Plan (SEP) - this document
- A Non-Technical Summary NTS,
- Environmental and Social Action Plan (ESAP)³.

All the above information will also be made available in hard copy at:

- Gurmat headquarters in Ankara
- Gurmat office in Efeler plant
- Municipality of Germencik and Incirliova
- Affected villages (Alangullu, Erbeyli, Kizilcagedik, Omerbeyli, Sinirteke, Turanlar, Akçeşme)

Community disclosure meetings will be completed in 3 weeks at project nearby settlements, and in 60 days period for the other stakeholders after the Lenders' approval. Comments, and feedbacks of the stakeholders will get by ESIA Feedback forms (See Appendix-C) which will be distributed with NTS.

The project team will answer questions from the public and stakeholders during the disclosure process. The Public Relations Manager of the Project will be responsible for receiving and collecting all comments. All received comments will be fed into the SEP documentation.

² Please note that Formal disclosure of the ESIA was done in October 2018. However as additional studies conducted for the project, all project documents were updated and now will be shared with the public as our ongoing commitment to disclose information on project in line with the PR 10 requirements.

Table 6. Stakeholder engagement programme during ESIA disclosure process (July-August 2019)

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsible party	Date
Local communities: Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme All relative governmental and non governmental organizations.	Website Face to face meetings in the local area	To provide access to information in a timely and efficient manner. (See Appendix D for the Meeting Record Form)	Disclosure of ESIA documentation (ESIA report, ESAP, SEP, ESMMPs, etc.) Provide information about: -Finalization of ESIA documentation -Comments and suggestions received during the ESIA disclosure and further on, during project implementation period, will be considered by Gurmat and incorporated in the ESMs if relevant.	Gurmat website/ EBRD website Gurmat office Authority Offices	Gurmat Community Relations Manager	June – August 2019
Local communities (including women and vulnerable groups) and Mukhtars	Public consultation through meetings	To offer information on ESIA documentation (See Appendix D for the Meeting Record Form)	Provide access to ESIA documentation by posting and providing a printed copy of NTS, and SEP at local municipality and mukhtar's offices. Representatives of local communities will have to possibility to consult the ESIA documentation at the premises of the municipality and at the company's office. Electronic versions of the report can be provided to the village representatives if requested. Hard copies of NTS and SEP will be provided to the community members Face to face meetings with the affected villages during disclosure process	Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods Germencik Municipality Incirliova Municipality	Gurmat Community Relations Manager	June 2019
Local and international NGOs and CSOs	Meetings Website	To offer information on ESIA documentation	Provide information about: Finalization of ESIA documentation Comments and suggestions received during the ESIA disclosure and further on, during project implementation period, will be considered by Gurmat and incorporated in the ESMs if relevant.	NGO offices and Gurmat offices Gurmat website/ EBRD website	Gurmat Community Relations Manager	June – August 2019
Media	Face-to-face meetings Website	To offer information on ESIA documentation	Provide information about: Finalization of ESIA documentation	Local Media offices and Gurmat offices Gurmat website/ EBRD website	Gurmat Community Relations Manager	June 2019

Table 7. Stakeholder engagement action plan for construction and operation phases

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsible party	Date
All relative stakeholders	Preparing information packages on GPP and disclosure documents	To discuss project phases, updates, and receive feedback	Information on project progress and activities will be updated regularly. Information published with information packages will be made available on the website. All disclosure material will be made available on project website. Grievance communication means will be specified in the website	Gurmat project website and EBRD website	Gurmat Community Relations Manager	Annually
	Providing detailed information on Project web-site	To discuss project phases, updates, and receive feedback	The information on project progress and activities will be updated regularly. Information published with information packages will be made available on the website. All disclosure material will be made available on project website. Grievance communication means will be specified in the website	Gurmat project website and EBRD website	Gurmat Community Relations Manager	Annually
	Keeping detailed stakeholder consultation data Revising external grievance form	To receive /record feedback, grievances and advices regarding the Project Keeping systematic records of received complaints from the local stakeholders in the grievance log	The grievance form that is used by external stakeholders will be updated and will include an option of anonymous filing. It is recommended that a clause is added, stating that the personal information will be kept protected (according to Privacy Act Law No 6698) and that the grievance holders are informed about the fact that their personal information will be protected. If brochures or information leaflets are distributed during consultations, copies will be attached to meeting minutes and included in the stakeholder consultation data sheet. Stakeholder consultation data will be kept in a compiled excel list with detailed information on date of engagement, stakeholder consulted, reason for engagement, main issues, and actions taken. When consultations are group based, the number of attendees needs to be kept. Especially grievances received face to face should be recorded. The log should include information on details about the grievance, time and process of solving the grievance. The records will be kept separately from internal grievances.	Gurmat Office	Gurmat Community Relations Manager	Weekly
	Preparing feedback form that will be carried in every vehicle	To record grievances , feedback and advices	In order to immediately record grievances received while visiting the field, a feedback form will be prepared so that once the PAP states a grievance the grievance can be recorded immediately by project employees on paper and will be return to CR department. These feedback forms will be placed in all Gurmat vehicles. (See Appendix – I)	All vehicles of Gurmat	Gurmat Community Relations Manager	June 2019

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsible party	Date
All relative stakeholders (especially mukhtars and local authorities	Preparing information packages on GPP and disclosure documents	To discuss project phases, updates, and receive feedback	The information package will not be too technical and will be written in a comprehensible language. These information packages, which will include brochures, booklets, posters should be distributed to mukhtars and local public authorities specifically and will be also made available in public spaces for all stakeholders. All brochures and posters will also include communication channel information to record grievances.	Germencik and Incirliova district Center Governmental Institutions Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods Gurmat offices	Gurmat Community Relations Manager	Until the end of 2019
All relative local authorities	Face to face meetings in the local area	To discuss project phases, updates, and receive feedback	Meetings to be conducted with all district level Public Institutions. Update on project progress and detailed information project activities will be provided. Any related grievances they have received will be discussed during these meetings.	Offices of Governmental Institutions	Gurmat Community Relations Manager	Semi-annually
Mukhtars of Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods	Face to face meetings in the local area	To discuss project phases, updates, and receive feedback	Share information on project activities Information package documents on emergency response, community health and safety management, how operational impacts are addressed.	Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods	Gurmat Community Relations Manager	July 2019 – Continuous
Local Communities of Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods	Public consultation through meetings	To discuss project phases, updates, and receive feedback	Inform affected communities on project activities and precautions on potential risks, stakeholder meetings will be conducted in affected communities. Share informative brochures	Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods	Gurmat Community Relations Manager	Semi-annually
Local communities (including women and vulnerable groups) and Mukhtars	Public consultation through meetings	To offer information on ESIA documentation	Separate informative meetings for women PAPs Informative brochures will be shared	Omerbeyli, Kizilcagedik, Alangullu, Turanlar, Sinirteke, Erbeyli, Akçeşme neighborhoods Germencik Municipality Incirliova Municipality	Gurmat Community Relations Manager	Semi-annually

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsible party	Date
Relative NGOs Local Media	Sharing information packages with NGOs	To discuss project phases, updates, and receive feedback	NGOs information packages will be distributed Local media representatives will be visited, and information packages will be shared	NGO and Gurmat Offices	Gurmat Community Relations Manager	Semi-annually
Local communities, Mukhtars and authorities	Project site visits for institutions and local communities/mukhtars	To discuss project phases, updates, and receive feedback	Organize field visits to allow the stakeholders to gain higher level of information on the project. Also, mukhtars and representatives of local communities should be encouraged in these field visits. Separate project site visits should be organized for NGOs and media every year.	Project Site	Gurmat Community Relations Manager	Annually
Internal Stakeholders	Training the social team of Efeler GPP on EBRD requirements, SEP and ESIA documents	To increase efficiency of stakeholder engagement according to EBRD requirements	The social team will be trained on EBRD social requirements and ESIA documents, especially SEP.	Gurmat Office	Gurmat Community Relations Manager	Annually during the construction phase
	Adding information on internal grievance mechanism and external grievance mechanism to the orientation training	To inform all staff on how grievance mechanism works and how they can file their grievances	The orientation training will include information on grievance mechanism of Efeler GPP.	Project Site	Gurmat Community Relations Manager HR Department	As needed
	Conducting internal and external grievance trainings for the staff	To inform all staff on how grievance mechanism works and how they can file their grievances	All staff will be trained on how grievance mechanism works and will be informed on how they can file their grievances.	Gurmat Office	Gurmat Community Relations Manager	Annually

Stakeholder	Engagement method	Purpose of engagement	Information disclosed/collected	Location	Responsible party	Date
	Updating the Request and Complaint Form	To keep personal information private and add anonymous grievance option (See Appendix I for the Internal Grievance Form)	The Request and Complaint Form used by employees for grievance filing will be updated to include an option of anonymous filing. It is recommended that a clause is added, stating that the personal information will be kept protected (according to Privacy Act Law No 6698) and that the grievance holders are informed about the fact that their personal information will be protected.	Gurmat Office	Gurmat Community Relations Manager	Construction phase
	Keeping systematic records of received complaints by workers in the grievance log	To manage all grievances in an official system	All grievances received will be recorded in the grievance log excel. Especially grievances received face to face should be recorded. The log should include information on details about the grievance, time and process of solving the grievance. The records will include a note on how long it took the grievance to be closed and how the grievance is received (public institutions, face-to-face meeting, security department, other departments etc.). The records will be kept separately from external grievances.	Gurmat Office	Gurmat Community Relations Manager HR Department	Weekly

7. Grievance Mechanism

The Company already has in place a grievance mechanism for Gurmat-2 GPPs (Efe-1, Efe-2, Efe-3 and Efe-4). Within this scope, the Company appropriately addresses all related grievances in a timely manner. The contractors are also responsible of receiving and addressing any grievances in line with the Company's standards. Contractor grievance response performance will be monitored by the Company.

7.1. Grievances Up-to-date

The grievances received by the Project include use of land without consent especially for pipeline access. Compensation for grievances includes grievances from loss of crops or damages to standing crops and assets. There were no grievances on land acquisition received from mukhtars during field studies

Between the dates March 18th 2015 and February 7th 2019, 11 grievances were recorded. 9 of the grievances are closed and 2 are still open. 4 of the grievances were about damage to land because of activities of the company, 5 were about damage to crops and 2 were about rental of the affected parcels by the company. The grievances that are still open are about damage to land. One of the PAPs that reported these grievances has filed a court case. Below Table 8 shows the detailed number of grievances.

Table 8. Number of recorded grievances.

Grievance Subjects	Number of Grievances	Open	Closed
Damage to land	4	2	2
Damage to crops	5	0	5
Rental of affected parcels	2	0	2
Total	11	2	9

Source: Guris, 2019.

7.2. Grievance Procedure

7.2.1. Internal Grievance Procedure

The grievance procedure will cover employee and non-employee grievances. Contractor employees will also have access to the employee grievance mechanism. Employee suggestion boxes will be available at the construction camp sites/ power plants. According to the Gurmat Human Resources Procedure, which was revised in March 2019, the grievance mechanism regarding personnel was defined in Articles 4.30, 4.31 and 4.32. These articles state that there is a confidential complaint mechanism for employees (and their trade unions, if any). Employees either report their grievances verbally to their first supervisor or fill out the Request and Complaint Form (F.05.07), shown in Appendix I. The grievances received are evaluated at the OHS board meetings, evaluated and concluded as soon as possible. Feedback is given to all related parties about the grievances.

According to observations in the scoping field study the internal grievance mechanism will be updated to be more effective. The workers mostly report their grievances face-to-face and the records of the grievances are not recorded. As an improvement, the company will adjust the number of grievance boxes and especially locate them in common use areas. In order to have an effective internal grievance mechanism the company will develop an employee grievance procedure, share it with all workers and add information on grievance mechanism to the orientation training and record all grievances that are reported including the face-to-face meetings in the internal grievance log.

Also, the Request and Complaint Form will have an option of filing the grievance anonymously. Training on grievance mechanism will be held to all staff.

All grievances, actions agreed, status of actions, timing of grievance and actions, and responsible party to resolve the grievances etc. will be recorded in the internal grievance log by Human resources team. The HR will work with the social manager in close cooperation to report the status of grievances to the lenders as part of the AESRs.

7.2.2. External Grievance Procedure

Information regarding the procedure and channels (e.g. phone, and e-mail address) that can be used to lodge grievances will be provided in all nearby settlements within the Project Impact Area and on the grievance information posters hung in selected settlements are shown in Appendix H.

The grievance process for the Project is presented in Figure 2. Each complaint whether from an individual, entity or a community will be considered. A response to each specific complaint will be communicated to the party that raised it (complainant). A formal procedure will be used to log the key information provided by a complainant and to record any related incoming communications. A record of actions taken and resolutions agreed as a result of the grievance investigation will also be documented.

A formalized procedure, ensuring response to any concerns and complaints from affected stakeholders and communities is aimed. The implementation of the Grievance Procedure will be under the day to day responsibility of a designated Social expert/manager with related skills and experience. An external grievance form, which will be used to lodge a grievance, is provided, in Appendix E. In order to improve the effectiveness of grievance mechanism the Project is performing updates on the grievance mechanism especially considering systematic record keeping of received grievances (including face-to-face meetings).

The grievance mechanism is widely announced to the public with stakeholder meetings held in 7 project affected communities. Additional meetings will be organized to target women PAPs and vulnerable groups for sharing information on grievance mechanism. Project specific modes of communication that includes a website, dedicated phone line will be available to PAPs to communicate their grievances and will allow for anonymous filing of complaints/requests.

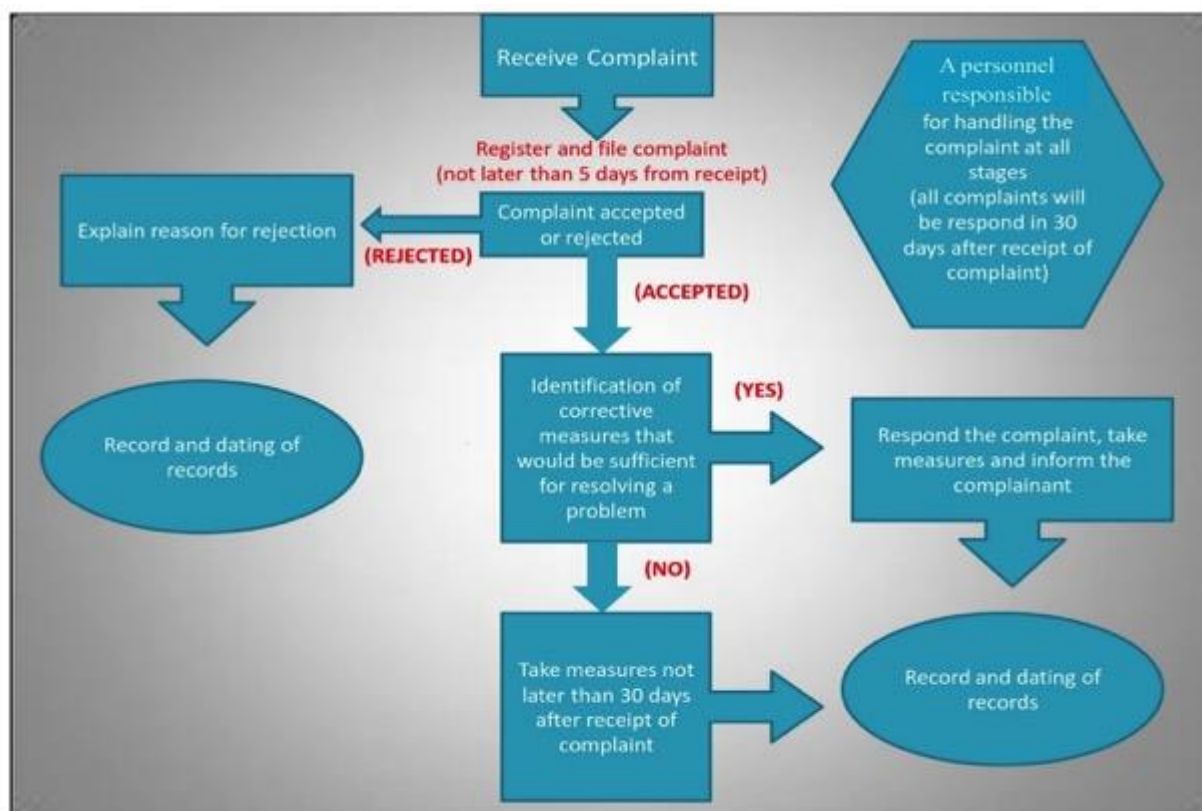


Figure 3. Grievance procedure diagram

8. Monitoring and Reporting

The SEP will be periodically reviewed and updated, as necessary, during the course of the Project implementation. The Company will record all incoming complaints in Grievance Register Template and Grievance Register Template (See Appendix-G)

Monthly summaries of grievances raised by internal and external stakeholders, queries and related incidents together with the implementation status of corrective/preventive actions will be referred the Company's senior management. Monthly summaries will be used to assess both the number and nature of complaints (if any), along with the Company's ability to address complaints in a timely and effective manner. The SEP Monitoring Framework for Efeler GPP is described below in Table 9.

Table 9. SEP Monitoring Framework

Monitoring Focus	Monitoring Indicator	Time	Monitoring Frequency	Parties Responsible for the Monitoring
Public trust and Satisfaction	- Number of grievances and type of grievances - List of CSR activities according to settlement, type of activity, targeted number of beneficiaries reached, coverage in the local media	Construction and Operation	Monthly	Efeler GPP - internal
			Once every 6 months	External resources if required
Public consultation process and grievance mechanism	- Identified public consultation process - record of the activities, - number of the meetings held, - number of the participants attended the public consultation meetings, - visits paid to local authorities or other local stakeholders, - frequency of the visits paid to the settlements affected by the Project, - number of grievances raised per settlement - types of grievances (complaint/request) - timeline required to solve grievances - status of grievances (open/closed) - number of grievances that are on hold/ or disagreed	Construction and Operation	Monthly	Efeler GPP - internal
			Once every 6 months	External resources if required

9. Responsibilities

The Company will have an overall responsibility for undertaking and supervising engagement with all stakeholders in relation to the Project and will use available resources to ensure that the relevant activities are conducted effectively and to the appropriate standard. Received grievances and response status with actions taken/ to be taken and the results will be summarized in monthly reports. These reports will include a section detailing the number and nature of grievances received and the Company's performance in addressing the grievances.

The Operation Coordinator will review these reports to ensure all grievances are responded to appropriately. The construction and operation phase contractors will be monitored closely in order to comply with the requirements of this SEP.

Table 10. Roles and Responsibilities

Roles	Responsibilities
Operation Coordinator	Ensures SEP implementation Reviews monthly internal reports for consultations and grievances
Community Relations Department	Implements and improves this SEP Determines necessary resources for effective implementation of this SEP Evaluates the compliance of Project activities with national and international legislation requirements, Searches the causes of the social incidents that cause; injuries, delays or stoppage in the work and disputes among Project and communities Monitors all grievances and ensure that all complaints are recorded, resolved and closed. Coordinates with parties for proper implementation of this SEP Carries out consultations and meetings in line with SEP. Keeps records of all consultations and reports monthly to Operation manager.

10. Contact Information for the Public

Table 11. Contact information

<i>Gurmat Head Office</i>	Address: Ankara Caddesi No: 222, Karaoğlan Mahallesi, Golbasi, 06830, ANKARA Telephone number: +90 (312) 484 05 70 Fax: +90 (312) 484 45 78 E-mail: info@gurmat.com.tr Website: www.mogan.com.tr
<i>Project Site</i>	Address: Omerbeyli Koyu Mevkii, Germencik, Aydın, Turkey Telephone number: +90 (256) 563 33 25 Fax: +90 (256) 563 35 11 Contact Name: Senem Bulut

Appendix A. Social Supports of Efeler GPP

Support	Supported Stakeholder	Stakeholder Type	Period	Location
Workshop of "Living with Geothermal"	Community	Community	2017	Germencik
Renovating the entire school for re-opening	Primary School	Public	2017-2018	Ömerbeyli
Constructing higher walls around school	Secondary School	Public	2016-2017	Erbeyli
Renewal of outside paint and floor paint	Kindergarten	Public	2017	Ortaklar
Scholarship for women students for 2 years	University students	University	2017-2018	Aydın
Renewal of band instruments	Secondary School	Public	2017	Akçaköy
Construction and founding of Yamanturk Vocational School, which became a part of Adnan Menderes University	University/Vocational School	University	2016-2018	Germencik
Donating a service vehicle (Ford tourneo/custom)	Irrigation Union	Private	2014	Ömerbeyli
Constructing a wedding hall	Community	Community	2009	Ömerbeyli
Conducting foundation and steel construction works for new building	Municipality	Municipality	2017	Germencik
Providing construction iron and concrete for additional building construction	Gendarmerie	Public	2016	Germencik
Conducting iron joinery works for additional building	Gendarmerie	Public	2017	Germencik
Constructing 2870 meters of hot mix asphalt road between Omerbeyli neighborhoods as the village residents requested	Community	Community	2017	Alangüllü - Ömerbeyli
Providing Iftar meal during for 20.850 people the Ramadan month, every day in a different affected village (Omerbeyli, Erbeyli, Alangüllü, Sınırteke, Dereagzi, Dağkaraağaç and Turanlar)	Community	Community	2016-2017-2018	İncirliova - Germencik
Distributing 16.000 saplings to close neighborhoods (Akçeşme, Omerbeyli, Erbeyli, Alangüllü, Sınırteke, Dereagzi and Dağkaraağaç) and conducting sapling planting festival	Community	Community	2009-2017-2018	İncirliova - Germencik
Providing paint for the building	Secondary School	Public	2017	Aydın
Mounting security cameras and audio system to the school	Primary School	Public	2018	Turanlar
Relocating the 10th year Monument gifted by Ataturk to the newly arranged neighborhood center	Community	Community	2008	Ömerbeyli
Renewal and stabilizing of the road between Omerbeyli and Akçeşme and providing wire fence of 2600 meters around the road	Community	Community	2018	Akçeşme-Ömerbeyli
Mounting audio system and air condition system to the mosque	Mosque	Community	2018	Ömerbeyli
Providing entrance signs in the entrance of villages	Community	Community	2009	Alangüllü - Ömerbeyli

Support	Supported Stakeholder	Stakeholder Type	Period	Location
Constructing wire fence and wall around the cemetery and cleaning up the cemetery	Community	Community	2018	Ömerbeyli
Providing ready-mixed concrete to house construction of imam	Community	Community	2010	Alangüllü
Providing support for water-tank with a fountain construction	Community	Community	2010	Alangüllü
Repairing the roof of the mosque	Mosque	Community	2018	Akçeşme
Distributing 400 cups of soup for 3 months in Germecik district center	Community	Community	2017-2018	Germecik
Supporting the sapling planting festival of Koçarlı Municipality by providing 200 pine saplings	Community	Community	2017	Koçarlı
Providing sponsorship for the Robotics team of Aydın to attend the competition in USA	High School	Public	2018	Aydın
Providing sponsorship support with JESDER to Aydın 1923 Sports Club	Sport Club	Private	2018	Aydın
Providing 70 club uniform for the Germecik Chess Club with the 1-year sponsorship contract	Community	Community	2018	Germecik
Carrying out stream improvements with construction machinery	Community	Community	2018	Germecik
Constructing bridges and culvert (2) across the stream and	Community	Community	2016	Ömerbeyli
Constructing wire fence around the south and east sides of the cemetery and arranging the inside of cemetery	Community	Community	2017	Alangüllü
Constructing wire fence and wall around private parcel	Community	Community	2018	Germecik

Appendix B. Contact Information of Stakeholders

Stakeholder Groups	Stakeholders	Contact Details
External Stakeholders		
National Governmental Organizations and Public Enterprises	Ministry of Energy and Natural Resources	Address: Turkocagi Cad. No:2 Pk: 06100 Cankaya/ANKARA Telephone: +90 (312) 212 6420
	Ministry of Forestry and Water Affairs	Address: Bestepe Mah. Alparslan Turkes Cad. No: 71 - Yenimahalle/ANKARA Telephone: +90 (312) 207 5000
	Ministry of Environment and Urbanization	Address: Mustafa Kemal Mahallesi Eskisehir Devlet Yolu 9. km. No: 278 Cankaya / ANKARA Telephone: 0312 410 1000 E-mail: cevreseshircilikbakanligi@hs01.kep.tr
	Ministry of Food, Agriculture and Livestock	Address: Universiteler Mah. Dumlupinar Bulvarı No: 161 Cankaya/ANKARA Telephone: +90 (312) 287 3360
	Ministry of Labor and Social Security	Address: Emek Mahallesi, 17. Cadde No:13 Çankaya / ANKARA Telephone: +90 (312) 296 6000
	Energy Market Regulatory Authority	Address: İşçi Blokları Mahallesi Muhsin Yazıcıoğlu Caddesi No:51/C Yüzüncüyıl/Çankaya/ANKARA Telephone: 0312 201 4000
	State Hydraulic Works	Address: Devlet Mahallesi , İnönü Bulvarı No: 16 Çankaya / ANKARA Telephone: 0312 454 5454
	General Directorate of Renewable Energy	Address: Eskisehir yolu 7. km No:166 Cankaya/ANKARA Telephone: 0312 295 5000 E-mail: info@yegm.gov.tr
	Turkish Electricity Transmission Company (TEIAS)	Address: Nasuh Akar Mah. Turkocagi Cad. No:12 Balgat/ANKARA Telephone: +90 (312) 222 8160
	Turkish Employment Agency	Address: Emniyet Mah. Mevlana Bulv. No:42, Yenimahalle/ANKARA Telephone: +90 (312) 216 3000
	Governorship of Aydın	Address: Köprülü-veysipaşa Mahallesi, Hükümet Blv. No:74 Merkez/Aydın Telephone: 0256 212 2416
	Germencik District Governorate	Address: Camikebir Mahallesi, Atatürk Cad. Hükümet Konağı D:36-38 Germencik/Aydın Telephone: 0256 563 1011
	İncirliova District Governorate	Address: Hürriyet Mahallesi, Kenan Evren Cad. Hükümet Konağı İncirliova/Aydın Telephone: 0256) 585 2426
	Aydın Metropolitan Municipality	Address: Güzelhisar Mahallesi, İstiklal Cad. No:4 Merkez/Efeler/Aydın Telephone: +90 444 40 09
	Germencik Municipality	Address: Yedieylül Mahallesi, Köprülü Mehmet Paşa Sk. No:16 Germencik /Aydın Telephone: +90 (256) 563 01 20 E-mail: basin@germencik.bel.tr
	İncirliova Municipality	Address: Cumhuriyet Mahallesi, Kenan Evren Cad. No:37 İncirliova/Aydın Telephone: +90 (256) 585 12 24 E-mail: bilgi@incirliova.bel.tr
	Germencik District Directorate of Agriculture	Address: İstasyon Mahallesi, Köprülü Mehmet Paşa Sk. Germencik/Aydın Telephone: 0256 563 10 24 Email: aydin.germencik@tarimnet.gov.tr
	İncirliova District Directorate of Agriculture	Address: İstiklal Mahallesi, Fevzi Paşa Cd. İncirliova/Aydın Telephone:02565852466 Email: aydin.incirliova@tarimnet.gov.tr
	Germencik Gendarmerie	Address: Park Mahallesi, Atatürk Cd. Germencik/Aydın Telephone: 0256 563 15 14
	İncirliova Gendarmerie	Address: Sandıklı Mahallesi, Şht. Asteğmen Süleyman Çamlıca Blv. İncirliova/Aydın Telephone: 0256 585 10 02
	Germencik District Police Headquarters	Address: Camikebir Mahallesi, Çetinkaya Sk. Özel İdare Binası No:19 Germencik Telephone: 0256 563 11 03
	İncirliova District Police Headquarters	Telephone: 0256 585 1619
	Local Emergency and Health Services	Various
	İncirliova Fig Research Institute Directorate	Adress : İncir Araştırma Enstitüsü Müdürlüğü / İncirliova - AYDIN Telephone: 0256 581 1123 E-Mail : incir@tarimorman.gov.tr
Non-governmental	Nature Association	Adress: Kızılay Mahallesi, Menekşe-2 Sk. 33/5 Çankaya/Ankara Telephone: +90 312 481 25 45

Organizations	Environment Foundation of Turkey	Address: Tunali Hilmi Cad. No:50/20 Cankaya/ANKARA Telephone: +90 (312) 425 55 08 E-mail: cevre@cevre.org.tr
	WWF Turkey	Address: Buyuk Postane Cad. No: 19 Kat: 5 Bahcekapi Fatih/ISTANBUL Telephone: +90 (212) 528 2030 E-mail: info@wwf.org.tr
	Association of Geothermal Electrical Plant Investors Turkey Geothermal Association (JESDER)	Adress: 1203/11 Sokak No:3 D:4/409 Yenişehir / İzmir Telephone:0232 457 77 22 E-mail:info@jesder.org
	Federation of Turkish Women Associations	Address: Akay Cad. No: 15/2 Kucukesat/ANKARA Telephone: +90 (312) 417 2604
	Turkey Geothermal Association	Address: And Sokak 8/2 Çankaya – Ankara Telephone: 312-440 43 19
	Aydın Branch Office of Union of Chambers of Turkish Engineers and Architects (TMMOB)	Address: Efeler Mahallesi Evliya Çelebi Caddesi N0:15/1 – AYDIN Telephone: 0 256 212 11 40
	Aydın Branch Office of Chamber of Environmental Engineers	
	Aydın Branch Office of Chamber of Electrical Engineer	
	Aydın Branch Office of Chamber of Medical Doctors	Address: Cumhuriyet Mahallesi Vali Konağı Bulvarı No:45 Yıldırım Apartmanı K.1 D.2 Efeler Aydın Telephone: 0256 226 12 01
	Aydın Bar Association	Address: Aydın Adliye Binası Kat:2 Efeler Aydın Telephone: 0-256-225 13 47
	İncirliova Chamber of Agriculture	Address: İstiklal Mah. İnkilap Cad. No:2 İncirliova-Aydın Telephone:0 256 585 77 80-81
	Germencik Chamber of Agriculture	Address: Cami Kebir Mahallesi, Namık Kemal Caddesi Adliye Sokak, No: 2/6 Germencik, Aydın Telephone: 0 256 563 10 72
	Aydın Environment and Culture Platform (AYÇEP)	Address: https://www.facebook.com/Aydın-Çevre-ve-Kültür-Platformu-AYCEP-835551186490395/
	Germencik Environment and Nature Association (GERÇED)	Address: https://www.facebook.com/groups/1427690534196204/
	Aydın Environment Union (AYÇEM)	https://www.facebook.com/Aydın-Çevre-Mücadelesi-AYCEM-1009765095802702/
	Germencik Environment Protection Platform	https://www.facebook.com/groups/767447533296658/
	Women associations	Various
	Germencik Association of Mukhtars	Various
	İncirliova Association of Mukhtars	Various:
Local Communities/ Residents	Kizilcegedik mukhtar	Various
	Alangullu mukhtar	
	Turanlar mukhtar	
	Omerbeyli mukhtar	
	Turanlar mukhtar	
	Akçeşme mukhtar	
	Sinirteke mukhtar	
	Erbeyli mukhtar	
Universities	Aydın Adnan Menderes University	Adress: Adnan Menderes Üniversitesi Merkez Kampüsü, Kepez Mevkii Efeler/Aydın Telephone: 0256 218 2000



Appendix C. ESIA Feedback Form

GÜRMAT GEOTHERMAL POWER PLANTS CAPACITY INCREASE PROJECT

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

FEEDBACK FORM

You can write your questions and opinions about the Environmental and Social Impact Assessment study prepared for Gürmat Geothermal Power Plant Capacity Extension Project to the following addresses.

<u>Name-Surname</u>	
<u>Adress</u>	
<u>Phone Number</u>	
<u>Date</u>	
<u>Questions/Opinions/</u> <u>Comments</u>	

Contact Information

Ömerbeyli Mah.Ahmet Sarı Cad. No:13/1 09700 Germencik/AYDIN/TÜRKİYE



MEETING RECORT

Kayıt No- Record no :

Toplantı Yeri- Location :

Toplantı Tarihi- Date of Engagement :

Toplantının Amacı- Purpose of Engaement :

Katılımcılar- Attendees from the company :

Görüşülen Kişi(ler)- Contact Person(s) :

Görüşülen Konu (lar) :

Subject(s)

İlgili Döküman(lar) :

Related Document(s)

Appendix E. External Grievance Form

 gürmat	GÜRMAT GEOTHERMAL POWER PLANTS GRIEVANCE REGISTRATION FORM		
Grievance No		Date	
Complainant's; Name-Surname: Phone Number Address:			
Description of the Complaint			
Assessment of the Related Department			
Result-Decision			
Closure date of grievance	Name and Duty of the Responsible Person Signature		Signature of the Complainant

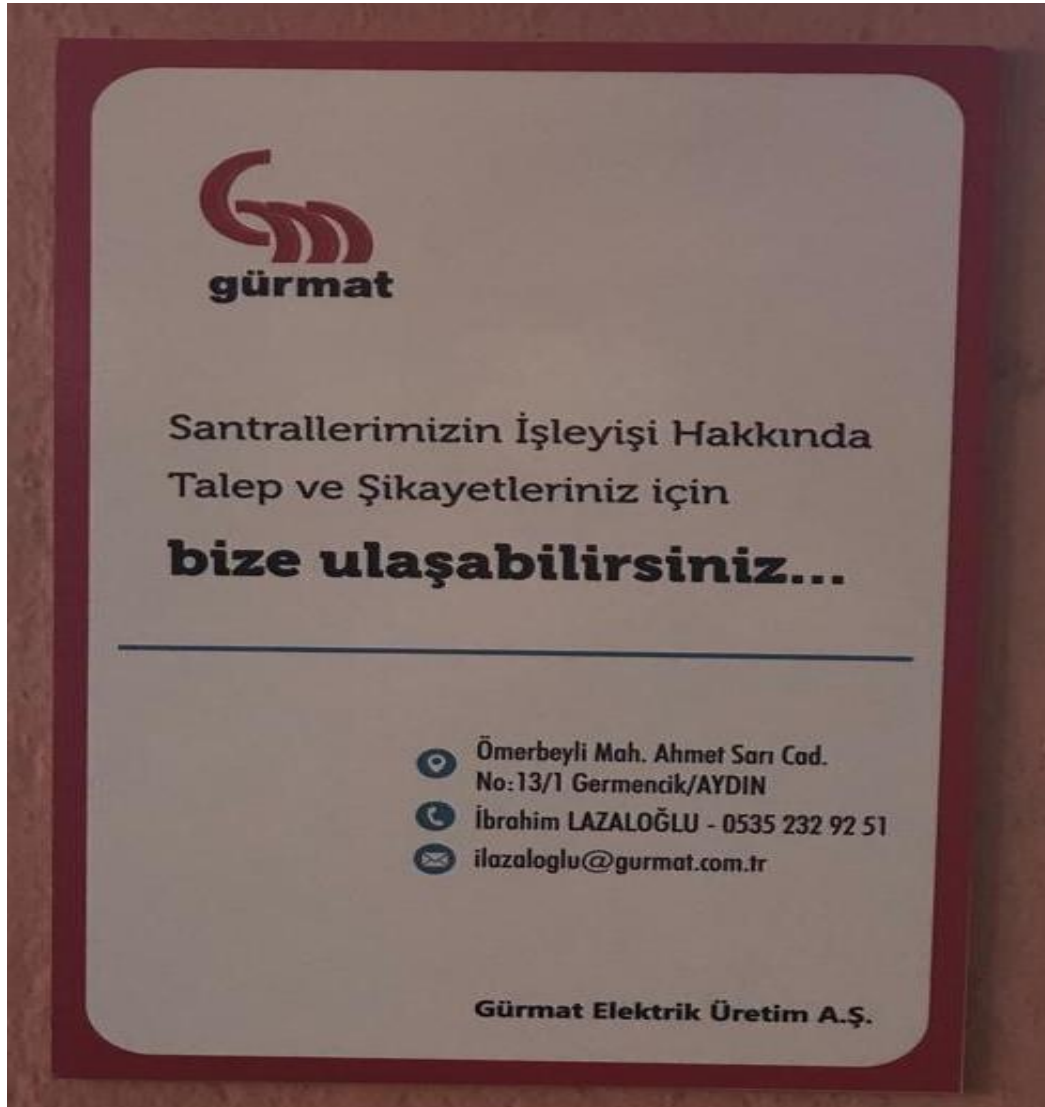
Appendix F Grievance Feedback Form

 GERİ BİLDİRİM, ŞİKAYET VE İSTEK KAYIT FORMU FEEDBACK, COMPLAINT& REQUEST FORM	KAYIT EDEN ADI& SOYADI ŞİRKETİ- GÖREVİ No 0001 RECORDER NAME& SURNAME COMPANY- DESIGNATION
BAŞVURU SAHİBİNİN ADI&SOYADI APPLICANT'S NAME&SURNAME	GERİ BİLDİRİMİN, ŞİKAYETİN& İSTEĞİN TANIMI DEFINE FEEDBACK / COMPLAINT / REQUEST
TELEFON NUMARASI PHONE NUMBER	
TARİH/DATE ADRES/ADDRESS	
NOT: Bu evrağı Halkla İlişkiler bölümüne teslim ediniz/ This form must be return to CR Department.	

Appendix G Grievance Register Template

Grievance #	Date	Complainant Name	Address / Phone number	Category of the complaint	Description of the complaint	Company Recipient	Dept assigned	Actions Taken	How decision was communicated to complainant	How company will avoid problem in the future	Status	Close out Date	Comments/Related Correspondence

Appendix H Grievance Information Poster



Appendix I. Internal Grievance Form

	REQUEST AND COMPLAINT FORM		
NO:		DATE:	
COMPLAINENT		RECEIVING STAFF	
NAME OF THE COMPANY:		NAME :	
NAME :		LAST NAME :	
LAST NAME :		DEPARTMENT :	
PHONE NUMBER :			
RELATED DEPARTMENT			
DESCRIPTION			
This section will be filed by the related department			
ASSESSMENT:			
CONCLUSION/DECISION ETC.:			
DEPARTMENT REPRESENTATIVE			
NAME:		DATE:	
LAST NAME:		SIGNATURE	

F.05.07-Rev00/01.03.2019

Appendix J. Social Studies Conducted as part of the ESIA Addendum Studies

As part of the ESIA Addendum studies, consultations have been conducted with the representatives of nearby local communities, affected persons, relevant local administrations and Project personnel. In this scope, face-to-face interviews were conducted by ESIA Consultant's social expert during the site visit held on 22 November 2017, which are summarized in the below table.

Title/Role	Contents of the Meeting
H&S Specialist	Health and Safety issues OHS Management System
Personnel Chief	HR Policies HR Management System
Environment, OHS and Logistics Officer	Labor and working condition Contractor agreements and monitoring systems
Head Employee Representative	Labor and working conditions Employee representative system Internal grievance mechanism
Director of Administrative Services	Stakeholder Engagement Mechanism Grievance process Land acquisition process
Land Owner	Land acquisition and compensation process
Headmen of Omerbeyli Neighborhood	Baseline socioeconomic information Grievance mechanism Stakeholder engagement activities
District Health Director of Germencik	Community health and safety issues

Appendix K. Photos of Social Studies Conducted as part of the ESIA Addendum Studies

Field study meeting photographs



Meeting with Incirliova Governor.



Meeting with Mayor of Incirliova.



Meeting with İncirliova District Directorate of Agriculture.



Meeting with Efeler Chamber of Agriculture Chairman and Board Members.



Meeting with İncirliova Chamber of Agriculture Chairman.



Meeting with Germencik Chamber of Agriculture Chairman and Fig Producers.



Meeting with Germencik Chamber of Agriculture Chairman.



Meeting at the Bar Association.



Meeting with Mukhtar of Alangullu.



Meeting with Mukhtar of Hıdırbeyli.



Meeting with Mukhtar of Sınırtepe.



Meeting with Mukhtar of Turanlı and Head of Germencik Yoruk Association.



Meeting with Agriculture Credit Cooperative.



Efeler 6 site visit.



Efeler 6 site visit.

Appendix L. Template of Stakeholder Consultation Log

No	Date	Efeler GPP representative that conducted consultation	Name of Consulted Stakeholder/Group	Type of Consulted Stakeholder (community/Public authority, Mukhtar etc)	Purpose of Consultation (Request, visit, etc.)	Consultation Place and Time	Consultation subject	Activities/action to be taken after the consultation, thoughts and comments