

KIYIKOY WIND POWER PLANT CAPACITY EXTENSION PROJECT

ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

DECEMBER 2019



KIYIKOY WIND POWER PLANT CAPACITY EXTENSION PROJECT

ENVIRONMENTAL AND SOCIAL ACTION PLAN

ESAP Ref.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PRs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1.	Implement the Project Environment and Social Management System (ESMS) incorporating the Company's Health, Safety, Environment and Energy Policy; Social Guidelines and Human Resources (HR) Policy	<p>-ESMS is required to be in place to avoid/minimize environmental and social risks</p> <p>-Contractors' and sub-contractors' implementation of ESMS is required to be ensured and strictly monitored</p> <p>- Compliance with national legislation and Project Standards and sound environmental and social performance is to be ensured throughout the Project</p>	-EBRD PR1 -Good Industry Practice (GIP)	<p>Project Company ("ALENKA Enerji Üretim ve Yatırım A.Ş.") to ensure implementation by all direct and contracted Project personnel</p> <p>Resources needs: -Adequate financial and human resources for implementation; -Involvement of Procurement and Legal and Compliance Departments of the Company for the incorporation of ESMS related requirements to the contractor, sub-contractor and supplier agreements -Involvement of independent certification and audit companies;</p>	<p>At least one month prior to start of construction (including site preparation works)</p> <p>-Prior to start of construction for construction contractors, sub-contractors and suppliers -Prior to start of operation for operation contractors, sub-contractors and suppliers</p> <p>Recertification audit to be completed for Capacity Extension Project within the specified timeframes</p>	<p>Written Health, Safety, Environment and Energy Policy; Social Policy and Human Resources (HR) Policy in place</p> <p>Contractual agreements incorporating requirements on the implementation of Project ESMS in place with contractors, sub-contractors and suppliers</p> <p>Valid ISO certifications in place for Capacity Extension Project (renewal/extension of existing certifications required before expiry dates);</p> <ul style="list-style-type: none"> o ISO 9001:2015 (valid until 8 January 2022; recertification audit required in Q4 2021) o ISO 14001:2015 (valid until 6 February 2020; recertification audit required Q1 2020) o OHSAS 18001:2007 (valid until 6 February 2020; recertification audit required Q1 2020) 	

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1.2.	Develop and implement Project-specific environmental and social (E&S) management plans for the construction and operation ¹ (during loan duration) phases of the Project	<p>-Required for sound management of E&S performance of the Project</p> <p>-Contractors' and sub-contractors' implementation of the E&S management plans is required to be ensured and strictly monitored</p> <p>-Ensures full compliance with the requirements of applicable national legislation and achieve sound environmental and social performance meeting the requirements of international standards</p> <p>-Compliance with national legislation and Project Standards and sound environmental and social performance is to be ensured throughout the Project</p>	<p>-EBRD PR1, PR2, PR3, PR4, PR5, PR6 and PR8</p> <p>-GIP</p>	<p>Project Company to ensure implementation by all direct and contracted Project personnel</p> <p>Resources needs: -Adequate financial and human resources for the development and implementation of plans including trainings to be provided to all direct and contracted Project personnel on the scope and implementation of the plans</p> <p>-Involvement of external consultants for specific trainings</p>	<p>-At least one month prior to start of construction (including site preparation)</p> <p>-Relevant E&S management plans to be updated for operations at least 3 months prior to start of operation phase</p>	<p>-Following E&S management plans in place and implemented:</p> <ul style="list-style-type: none"> o E&S Management and Monitoring Plan o Air Quality and Greenhouse Gas Management Plan o Camp Site Management Plan (in case of on-site accommodation) o Community Health and Safety Management Plan (covering security management aspects) o Contractor and Supply Chain Management Plan o Cultural Heritage Management Plan (including the Chance Finds Procedure) o Biodiversity Action Plan o Emergency Preparedness and Response Plan o Habitat Restoration Plan o Hazardous Materials Management Plan o Human Resources Management Plan o Noise Management Plan o Occupational Health and Safety (OHS) Plan o Off-site Accommodation Management Plan o Stakeholder Engagement Plan (including internal and external Grievance Mechanism) (prepared as part of ESIA) o Traffic Management Plan o Training Plan o Waste and Wastewater Management Plan 	

¹ The operation phase referred to in this ESAP represent the part of operations until the end of financing period/loan duration.

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					Development of the RAP within 2 months after PAPs confirmation of his willingness to relocate (see ESAP Action 5.2)	<ul style="list-style-type: none"> ○ Resettlement Action Plan (for 1 vulnerable PAP²) in place and implemented ○ RAP budget allocated and spent progressively as planned in the RAP 	
					Implementation starts within 1 month after Financial Close	<ul style="list-style-type: none"> ○ Livelihood Restoration Plan (latter prepared as part of ESIA) in place and implemented ○ LRP budget allocated and spent progressively as planned in the LRP 	
					To be developed within 6 months after Financial Close (see ESAP Action 1.6)	<ul style="list-style-type: none"> ○ Community Development Plan (CDP) 	
					<p>-E&S Monitoring Reports to be submitted throughout the during loan duration</p> <p><i>*Note: Start of operation is assumed as the date when the WPP starts operating at full capacity</i></p>	<ul style="list-style-type: none"> ○ Implementation of E&S management plans documented in the periodic Environmental and Social Monitoring Reports to be submitted to the Lenders with the following frequencies ○ Quarterly during the construction phase ○ Bi-annually in the first year of the operation phase ○ Annually in the following years of operation (during loan duration) 	
					At the time of executing contractual agreements with the contractors	Contractual agreements incorporating requirements on the implementation of Project ESMS in place with contractors, sub-contractors and suppliers	
					-Within one week after the commencement of employment for all direct and contracted Project personnel (individually or collectively as necessary)	Training on the implementation of Project-specific E&S management plans to be provided to all direct and contracted Project personnel within one week after employment and refreshed periodically	

² The Environmental and Social Impact Assessment (ESIA) identified a vulnerable PAP living in the residential building located within the setback distance of T15 (approximately 200 m north of T15).
Kiyikoy WPP Capacity Extension Project

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					-To be refreshed; <ul style="list-style-type: none"> o Quarterly during the construction phase o Annually during the operation phase (during loan duration) 		
1.3.	Establish and maintain an organisational structure that defines roles, responsibilities and authority to implement the ESMS	-Ensures on-going compliance with applicable national legislative requirements and EBRD PRs -Ensures effective and continuous E&S performance through implementation of the ESMS	-EBRD PR1 -GIP	Project Company to ensure competent E&S personnel is involved in the Project for the implementation of the ESMS (both under the structure of the Project Company and the contractors and sub-contractors) Resources needs: - Adequate financial and human resources -Support from external experts as necessary	Prior to start of construction phase	Organizational structure (defined in the ESIA Report) established with key environmental and social personnel(s) positions filled under the Project Company; <ul style="list-style-type: none"> o Site Health, Safety and Environment (HSE) Senior Specialist for construction and operation o Community Liaison Officer (CLO) for construction 	
1.4.	Develop a Project-specific Permit Register for construction and operation phases (based on the list of main environmental permits and licenses provided in ESIA Report Chapter 1) and complete permitting requirements in line with applicable national legislation (see ESIA Table 1-9 for the list of main environmental permits and/or licenses); keep the permit register up to date throughout the Project	-Ensures compliance with national legislation -Close collaboration with related governmental authorities is essential to avoid any risk on Project schedule	-National legislative requirements	Project Company to ensure all required permits are in place Resources needs: -Personnel with good knowledge of the requirements of the national legislation; -Allocation of necessary resources for the management of permitting processes	-All permits required for construction are in place prior to start of construction phase -All permits required for operation are in place prior to start of operation phase	Relevant licenses, permits, approvals, agreements required under national law and regulations in place	

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				-Involvement of external permitting consultants, as required	-Monthly review and update throughout the construction phase -Annual review and update throughout the operation phase	Up-to-date permit register kept	
1.5.	Prepare and submit periodic Environmental and Social (E&S) Monitoring Reports to Lenders using an agreed template with Lenders	<ul style="list-style-type: none"> -Determines whether the Project is being implemented in accordance with the EBRD PRs, -Allows learning lessons, allocating resources and identifying opportunities for continuous improvement -Allows verification of effective ESMS implementation and compliance with national legislative requirements, EBRD PRs and Project Standards 	-EBRD PR1	Project Company to commission in-house experts for internal monitoring and independent consultants/experts for external monitoring Resources needs: -Adequate financial and human resources and systems -Appointment of an Independent E&S Consultant, for the collection and/or verification of its monitoring information	-First E&S monitoring site visit (for construction phase) within 3 months after Financial Close -E&S Monitoring Reports to be submitted	<ul style="list-style-type: none"> - Independent E&S Consultant appointed to perform Post Financial Close monitoring -Periodical Environmental and Social Monitoring Reports submitted to Lenders with the following frequencies: <ul style="list-style-type: none"> o Quarterly during the construction phase o Bi-annually in the first year of the operation phase o Annually in the following years of operation (during loan duration) <p><i>*Note: Start of operation is assumed as the date when the WPP starts operating at full capacity</i></p>	
					Report for significant incident/accident within 3 calendar days of incident/accident date	Separate reports for significant incidents/accidents submitted to Lenders	
1.6.	Develop and implement a Community Development Plan (CDP) as part of Corporate Social Responsibility	<ul style="list-style-type: none"> -Allows contribution to community dev. and maintaining good relations with the community -Enhance Company and Project image and reputation -Requires assessment and good planning for effective dev. and 	-EBRD PR1 -Voluntary	Project Company Resources needs: -Adequate financial and human resources -Involvement of development consultants, as required	-To be developed within 6 months after Financial Close -Implementation will start within 6 months in case Lenders' non-objection	<ul style="list-style-type: none"> -Written CDP in place and implemented -Progress with CDP implementation documented in Periodic E&S Monitoring Reports submitted to Lenders 	

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		managing expectations					
PR2 Labour and Working Conditions							
2.1.	Develop and implement Human Resources (HR) Policy in line with national legislation, EBRD PR2 and core conventions of ILO	<ul style="list-style-type: none"> -Helps maintaining good worker-management relationships -Minimizes the risks associated with personnel and contractor displeasure 	<ul style="list-style-type: none"> -EBRD PR2 -GIP 	Project Company to develop and ensure implementation by all direct and contracted Project personnel	<ul style="list-style-type: none"> At least one month prior to start of construction (including site preparation works) -Prior to start of construction for construction contractors, sub-contractors and suppliers -Prior to start of operation for operation contractors, sub-contractors and suppliers During the mobilisation works for construction and prior to start of construction Within one week after the start of contractors' work at the Project site E&S Monitoring Reports to be submitted in line with the frequencies specified in ESAP Action 1.5 	<ul style="list-style-type: none"> -Written Project-specific Human Resources Policy and Human Resources Management Plan in place and implemented -Contractual agreements incorporating requirements on the implementation of Project-specific HR Policy in place with contractors, sub-contractors and suppliers -HR Policy to be posted at the substation and construction contractor's camp site -Training on the implementation of Project-specific HR Policy to be provided to the Project Company management and management level personnel of contractors -Implementation of HR Policy documented in the periodic Environmental and Social Monitoring Reports to be submitted to the Lenders The monitoring reports will address: <ul style="list-style-type: none"> o Statistics on direct and contracted personnel (e.g. personnel hired from the local; female personnel; foreign workers) o Child and young labour o Overtime management o Worker accommodation conditions (on-site or off-site) 	

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						<ul style="list-style-type: none"> o Internal grievances received/resolved o Occupational health and safety incidents/accidents 	
2.2.	Implement the Grievance Mechanism for Project personnel (covering direct and contracted personnel) in line with the Project SEP	<p>-Ensures compliance with EBRD PR2 requirements, maintaining good worker-management relationships, minimises the operational, financial and reputational risks associated with personnel and contractor displeasure</p> <p>-Workers (including direct employees and contracted workers) are to be ensured that there is no risk of retribution or retaliation of the grievant and encouraged to use the mechanism</p>	-EBRD PR2 -GIP	<p>Project Company to develop and ensure implementation by all direct and contracted Project personnel</p> <p>Resources needs: -Provision of necessary tools (grievance boxes, etc.) provided at substation/construction camp/work sites;</p>	<p>-Boxes and forms to be posted at the substation site and construction camp site offices/cafeterias during the mobilisation works prior to start of construction</p>	<p>-Internal Grievance Mechanism in place and implemented</p> <p>-Grievance forms are available at the substation site and construction camps site offices/cafeterias</p> <p>-Records on grievance registry and close-out are kept systematically</p> <p>-All Project-related grievances are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP</p> <p>-Periodical Environmental and Social Monitoring Reports submitted to Lenders (covering the information on internal grievances received, actions taken, resolved/unresolved actions, etc.)</p>	
					-Within one week after the commencement of employment for all direct and contracted Project personnel (individually or collectively as appropriate)	-Training on the implementation of internal Grievance Mechanism to be provided to the management level personnel of the Project Company and contractors and all Project personnel (direct and contracted)	
2.3.	Develop and implement a Project-specific Camp Site Management Plan in case of on-site accommodation, ensuring adequate worker's accommodation conditions (on-site and if relevant off-site) in line with the national requirements, ILO standards and "IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards"; ensure relevant	<p>-Ensures compliance with national legislation and EBRD PR2 requirements</p> <p>-Helps maintaining good worker-management relationships</p> <p>-Minimizes the risks associated with personnel and contractor displeasure</p>	-EBRD PR2 -IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards -Relevant ILO Conventions -GIP	<p>Project Company to develop and ensure implementation by all direct and contracted Project personnel</p> <p>Resources needs: -Adequate financial resources -Sufficient land for establishment of</p>	Development of the Plan within 1 month after on-site accommodation decision is taken (in case of such a decision)	<p>-Construction Camp Sites Management Plan in place and implemented (in case of on-site accommodation)</p> <p>-Off-site Accommodation Management Plan in place and implemented</p> <p>-Statistics on workforce using on-site and off-site accommodation facilities kept</p> <p>-Periodical Environmental and Social Monitoring Reports submitted to Lenders (covering information on worker</p>	

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	aspects of EBRD/IFC Guidance Note on Workers' Accommodation (2009) applies to Project-related off-site accommodation as well	-Minimizes the health risks and reputational risks associated with inadequate accommodation conditions		adequate accommodation facilities -Internal auditing mechanisms		accommodation conditions both on-site and off-site, where applicable)	
2.4.	Ensure that all the direct and contracted workers are provided with trainings on BEE's corporate Social Guidelines at the beginning of employment (individually or collectively) covering the code of conduct for accommodation as well as general moral, cultural and ethical rules required from all Project workers	-Minimizes the risks associated with personnel and local communities	-EBRD PR2 -GIP	Project Company to develop and ensure implementation by all direct and contracted Project personnel	-Within one week after the commencement of employment for all direct and contracted Project personnel (individually or collectively as appropriate)	-Trainings provided and records kept	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1.	Conduct air quality (PM2.5 and PM10) monitoring one-off at receptors A-01, A-02 and A-03 (defined in the ESIA) at the peak period of construction works and also in case of receipt of dust - related grievances, and evaluate the results with respect to applicable national requirements and Project standards	-Ensures good ambient air quality levels. -Ensures compliance with national legislation, EBRD PR 3, and international standards	-National legislative requirements -EBRD PR 3 -GIP	Project Company Resources needs: -Adequate financial resources -Involvement of accredited laboratory required	At the peak period of construction at each receptor: -At A-01 when the construction works are at peak at the location of T15 -At A-02 and A-03 when the construction works (improvement and widening) for the main access road are at peak	-Air quality (PM2.5 and PM10) measurement results complying with the Project Standards -All grievances related to air quality are processed, managed/ resolved as appropriate within the timeframes defined in the Project SEP (if there is any)	

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3.2.	Conduct noise monitoring one-off at receptors N-01, N-02 and N-03 (defined in the ESIA) at the peak period of construction works and also in case of receipt of noise-related grievances, and evaluate the results with respect to applicable national requirements and Project standards	-Ensures compliance with national legislation, EBRD PR 3, and international standards	-National legislative requirements -EBRD PR 3 -GIP	Project Company Resources needs: -Adequate financial resources -Involvement of accredited laboratory required	At the peak period of construction at each receptor: -At N-01 when the construction works are at peak at the location of T15 -At N-02 and N-03 when the construction works (improvement and widening) for the main access road are at peak	-Noise measurement results complying with the Project Standards -All grievances related to noise are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP (if there is any)	
3.3.	If the PAP chooses to continue living in the building located in the setback distance of T15 (please see ESAP PR5 actions for relocation option to be offered), conduct noise monitoring during the operation phase of the Project at the house (N-01) located in the setback distance of T15 (where the vulnerable PAP lives) and evaluate the results with respect to applicable national requirements and Project standards	-Provides noise measurement data which can further be considered in taking appropriate measures at sensitive receptors. -Ensures compliance with EBRD PR 3, as well as national and international standards and best practices	-National legislative requirements -EBRD PR 3	Project Company Resources needs: -Adequate financial resources -Involvement of accredited laboratory required	On a monthly basis for the first year of operation	-Monthly noise monitoring results (monitoring to be performed by an accredited laboratory for 48 hours in each monitoring period) for the first year of operation (see ESAP Action 5.4, for the implementation of mitigation/corrective actions based on the results of monitoring) -All grievances related to noise are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP (if there is any)	
					On a quarterly basis for the second and third years of operation	-Quarterly noise monitoring results (monitoring to be performed by an accredited laboratory for 48 hours in each monitoring period) in the second and third year of operation -All grievances related to noise are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP (if there is any)	
3.4.	Develop and implement the environmental management plans listed in Action 1.2	-Required for sound management of E&S performance of the Project	-EBRD PR1, PR2, PR3, PR4, PR5, PR6 and PR8	Project Company to ensure implementation by all direct and contracted Project	- At least one month prior to start of construction (including site preparation works)	-Following E&S management plans in place and implemented: o Environmental and Social Management and Monitoring Plan	

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		<p>-Contractors' and sub-contractors' implementation of the E&S management plans is required to be ensured and strictly monitored</p> <p>-Ensures full compliance with the requirements of applicable national legislation and achieve sound environmental and social performance meeting the requirements of international standards</p> <p>-Compliance with national legislation and Project Standards and sound environmental and social performance is to be ensured throughout the Project</p>	-GIP	<p>personnel</p> <p>Resources needs: -Adequate financial and human resources for the development and implementation of plans including trainings to be provided to all direct and contracted Project personnel on the scope and implementation of the plans</p> <p>-Involvement of external consultants for specific trainings</p>	-Relevant environmental management plans to be updated for operations at least 3 months prior to start of operation phase	<ul style="list-style-type: none"> o Air Quality and Greenhouse Gas Management Plan o Emergency Preparedness and Response Plan o Hazardous Materials Management Plan o Noise Management Plan o Waste and Wastewater Management Plan 	
PR4	Health and Safety						
4.1.	Develop and implement a Project-specific Community Health and Safety Management Plan	<p>-Ensures compliance with national legislation and EBRD PR 4 and best practice.</p> <p>- Avoid risks to members of the community due to security personnel hired to guard the camp/work sites</p>	<p>-National legislative requirements</p> <p>-EBRD PR 4</p> <p>-EBRD Good Practice Handbook on Use of Security Forces</p> <p>-Best practice</p>	Project Company to ensure development and implementation by all direct and contracted Project personnel	<p>At least one month prior to start of construction (including site preparation works) (to be updated for operation phase at least 3 months prior to start of operations as necessary)</p> <p>Within one week after the commencement of assignment of security personnel (individually or collectively as</p>	<p>Community Health and Safety Management Plan (covering security management aspects) in place and implemented</p> <p>Trainings on code of conduct, human rights and use of force are provided to all security personnel and records are kept</p>	

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					appropriate)		
					Throughout the construction and operation phases (during loan duration)	-All grievances related to Project's security arrangements are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP (if there is any)	
4.2.	Develop and implement Occupational Health and Safety Plan and detailed OHS procedures (on overtime management, job hazard analysis, induction trainings, job specific trainings, refreshment trainings, toolbox talks, work permit system, PPE use, incident/accident reporting system, OHS auditing, etc.) ensure a safe working environment	-Ensures compliance with national legislation and EBRD PR2, PR4 requirements -Minimizes occupational risks on personnel health and safety such as injuries/fatalities due to accidents	-National legislative requirements -EBRD PR2, PR4 -Relevant ILO Conventions -GIP	Project Company to develop and ensure implementation by all direct and contracted Project personnel Resources needs: -Adequate financial and human resources; -Provision/ procurement of necessary safety/warning signs and personal protective equipment (PPE) -External specialists may be involved for trainings	Prior to start of construction (to be updated for operation phase at least 3 months prior to start of operation phase)	-Written Project-specific Occupational Health and Safety Plan and detailed procedures in place and implemented	
					-Within one week after the commencement of employment for all direct and contracted Project personnel (individually or collectively as appropriate) -To be refreshed; <ul style="list-style-type: none"> o Quarterly during the construction phase o Annually during the operation phase 	-Trainings on OHS Plan implementation are provided to all direct and contracted Project personnel	
					Throughout the construction and operation phases (during loan duration)	-Incident/accidents are reported and managed in line with the Project OHS Plan -Incident/accident statistics of all Project personnel are kept	
4.3.	In case the vulnerable PAP living in the setback distance of T15 is unwilling to relocate (see actions defined under PR5), engage with the vulnerable PAP regarding his experience on shadow-flicker	-Ensures compliance with EBRD PR4 and P10 requirements -Minimizes community health and safety risks	-EBRD PR4, PR10 -GIP	Project Company Resources needs: -Adequate financial and human resources;	-Initial notification to be made within 1 month after Financial Close or during ESIA disclosure (whichever will be earlier)	Evidence on vulnerable PAP's notification about the Project Grievance Mechanism	

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	throughout the first year of operation (except the months May, June and July when there is no shadow flicker impact anticipated) and inform the PAP about the Project Grievance Mechanism so that the PAP can convey his grievance in case of shadow flicker impacts; and based on the outcomes of the on-going engagement to be conducted in the first year of the operation, consult with the PAP and the legal owner (if required) of the building in order to develop and implement actions for the management of shadow flicker impact with a mutually agreed method that will be approved by Lenders			-Procurement and installation of equipment/materials for the management of shadow flicker impact at the house located within the setback distance may be necessary	<p>-To be refreshed;</p> <ul style="list-style-type: none"> o Prior to start of construction phase o Prior to start of operation phase 		
					At the end of first year of operation (on-going afterwards as necessary and/or if required by the Lenders)	Documentation of engagement with the vulnerable PAP and the owner of the building in the north of T15 regarding his experience on shadow-flicker throughout the first year of operation (except the months May, June and July when there is no shadow flicker impact anticipated)	
					Progressively in parallel to monitoring and on-going engagement activities	Evidence on implementation of mitigation actions	
4.4.	In case the vulnerable PAP living in the setback distance of T15 is unwilling to relocate (see actions defined under PR5), monitor the ice throw risk by means of review of SCADA results, meteorological data recorded at the WPP and visual observation during the period between December and March (both inclusive) on an on-going basis throughout the operation; and develop and implement an Ice Throw Risk Assessment and Management Procedure	-Ensures compliance with EBRD PR4 and P10 requirements -Minimizes community health and safety risks	-EBRD PR4, PR10 -GIP	Project Company Resources needs: -Adequate financial and human resources	Development of the Ice Throw Risk Assessment and Management Procedure within 6 months after PAPs confirmation of his unwillingness to relocate and within 3 months prior to the start of operation	Ice Throw Risk Assessment and Management Procedure (with non-objection from Lenders) in place and implemented	
					On a monthly basis for the first year of operation (on-going afterwards as necessary and/or if required by the Lenders)	Monthly reports on icing at the WPP for the period between December and March (both inclusive)	

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4.5.	Develop and implement a Project-specific Traffic Management Plan for the construction phase	<ul style="list-style-type: none"> -Implementation of the Traffic Management Plan will prevent/minimize traffic incidents/accidents. -Ensures compliance with PR 4 and best practice. 	<ul style="list-style-type: none"> -EBRD PR 4 -GIP 	Project Company to ensure implementation by all direct and contracted Project personnel	Within 1 month after Financial Close (for construction phase)	<ul style="list-style-type: none"> -Traffic Management Plan in place and implemented -Reported number of incidents/accidents relevant to Project-related traffic -All grievances related to Project induced traffic are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP (if there is any) 	
					Throughout the construction and operation (during loan duration) phases	<ul style="list-style-type: none"> -Incident/accidents are reported and managed in line with the Project OHS Plan and Community Health and Safety Management Plan -Traffic related incident/accident statistics are kept - Trainings on Traffic Management Plan implementation are provided to all direct and contracted Project personnel and kept 	
4.6.	Develop and implement a Project-specific Emergency Preparedness and Response Plan, covering both construction and operation phases of the Project.	<ul style="list-style-type: none"> -The Plan will provide the necessary tools to manage emergency situations and allow for collaboration with communities and related authorities/emergency services. -Ensures compliance with PR 2, PR 4 and best practice. 	<ul style="list-style-type: none"> -National legislative requirements -EBRD PR 2 -EBRD PR 4 -Best practice 	Project Company to ensure implementation by all direct and contracted Project personnel Resources needs: <ul style="list-style-type: none"> -Adequate financial and human resources -Involvement of authorities and local communities is required in planning, coordination and response to potential events 	At least one month prior to start of construction (including site preparation works) (to be updated for operation phase at least 3 months prior to start of operations as necessary)	<ul style="list-style-type: none"> -Emergency Preparedness and Response Plan in place and implemented -Emergency drill plan in place and implemented 	
					Throughout the construction and operation (during loan duration) phases	<ul style="list-style-type: none"> -Records on emergency drill activities are kept -Records on emergency events are kept 	

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PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1.	Further engage with the vulnerable PAP living in the setback distance of T15; inform the PAP on the potential impacts of the Project (e.g. noise, shadow flicker, ice throw) based on the findings of the ESIA and the proposed mitigation measures including the option for relocation during the construction and operation (the Project Company will recognise the right of the PAP to choose relocation until the end of second year of operation); obtain confirmation of his unwillingness or willingness to relocate on condition that the Project Company provides him with a shelter with security of tenure, where he would feel himself comfortable to stay (considering his vulnerability)	-Ensures compliance with PR 5 and good practice -Avoids adverse E&S impacts and/or risks on PAPs and ensures good relationships with the stakeholders	-EBRD PR5 -Good Practice	Project Company to ensure engagement with the PAP Involvement of E&S experts will be required for informing the PAP about the findings of E&S assessments In addition, PAP should be informed of his right to have a representative of his choice to support him during the discussions	During the ESIA public disclosure period	Documentation of the engagement including confirmation of vulnerable PAP's willingness to relocate	
5.2.	In case the vulnerable PAP confirms his willingness to relocate during Project construction or operation (the Project Company will recognise the right of the vulnerable PAP to choose relocation as long as the Project is operating), develop and implement a Resettlement Action Plan (RAP) for the relocation of this PAP to a resettlement site through provision of adequate housing with improved living conditions, where the PAP would feel himself comfortable to stay (considering his vulnerability)	-Ensures compliance with PR 5 and good practice -Avoids adverse E&S impacts and/or risks on PAPs and ensures good relationships with the stakeholders	-EBRD PR5 -Good Practice	Project Company to ensure engagement with the PAP Involvement of independent resettlement experts, approved by Lenders, required for development of a RAP for the vulnerable PAP as per EBRD PR5	-Development of the RAP within 2 months after PAPs confirmation of his willingness to relocate -Timeframe for RAP implementation to be agreed with the PAP and the owner of the building within 1 month after Lender's approval of the RAP -RAP to be implemented in line with the timeframe approved by the Lenders	RAP in place for the vulnerable PAP (with non-objection from Lenders) Alternatively, ring-fenced funds available for preparation and implementation of a RAP at a later date during Project operation, should the PAP subsequently accept the option to relocate.	

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5.3.	<p>In case the vulnerable PAP confirms his unwillingness to relocate;</p> <p>-Monitor the noise impact through monthly measurements to be conducted by an accredited laboratory for 48 hours in each monitoring period</p> <p>-Monitor the ice throw risk by means of review of SCADA results, meteorological data recorded at the WPP and visual observation during the period between December and March (both inclusive)</p> <p>-Engage with the PAP regarding his experience on shadow-flicker throughout the first year of operation (except the months May, June and July when there is no shadow flicker impact anticipated) and inform the PAP about the Project Grievance Mechanism so that the PAP can convey his grievance in case of shadow flicker impacts</p>	<p>-Avoids adverse E&S impacts and/or risks on PAPs and ensures good relationships with the stakeholders</p> <p>-Avoids risks due to unresolved/ unmanaged grievances</p>	<p>-EBRD PR1, PR3, PR10</p> <p>- Good Practice</p>	<p>Project Company to ensure engagement with the PAP</p> <p>Involvement of accredited laboratory required for monthly noise measurement during the first year of operation</p>	<p>Within the first year of operation (start of operation is assumed as the date when T15, T16 and T17 start to operate)</p>	<p>-Obtain documentation signed by the vulnerable PAP confirming that he has been provided by the Company with an adequate relocation alternative due to Project's potential E&S impacts and/or risks within the setback distance and that the PAP has refused the relocation alternative offered by the Company with his free will (in the form of a waiver letter) (The Project Company will recognise the right of the vulnerable PAP to choose relocation as long as the Project is operating),</p> <p>-Monthly noise monitoring results (monitoring to be performed by an accredited laboratory for 48 hours in each monitoring period)</p> <p>-Monthly reports on icing at the WPP for the period between December and March (both inclusive)</p> <p>-Documentation of engagement with the PAP and the owner of the building in the north of T15 regarding his experience on shadow-flicker throughout the first year of operation (except the months May, June and July when there is no shadow flicker impact anticipated)</p> <p>- Evidence on PAP's notification about the Project Grievance Mechanism</p>	
5.4.	<p>In case the vulnerable PAP confirms his unwillingness to relocate; based on the monitoring results and outcomes of the on-going engagement to be conducted in the first year of the operation, consult with the PAP and the legal owner (if required) of the building in order to develop and implement mitigation/corrective actions for</p>	<p>-Avoids adverse E&S impacts on PAPs and ensures good relationships with the stakeholders</p> <p>-Avoids risks due to unresolved/ unmanaged grievances</p>	<p>-EBRD PR1, PR3, PR5, PR10</p> <p>-Good Practice</p>	<p>Project Company to ensure engagement with the PAP</p> <p>-Adequate financial and human resources for implementation of actions (e.g. procurement of equipment for</p>	<p>-Evaluation of monitoring results on a monthly basis and development of mutually agreed at the end of each monthly monitoring campaign throughout the first year of operation</p> <p>-Evaluation of the complete set of the</p>	<p>-Documentation of engagement with the PAP and the owner of the building in the north of T15 regarding and evidence of agreement of the PAP and the owner of the building on the actions developed for the management of noise, shadow flicker impact and blade/ice throw risk</p> <p>-Evidence on implementation of mitigation actions</p> <p>- Grievance Mechanism in place and</p>	

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	the management of noise, shadow flicker impact and blade/ice throw risk with a mutually agreed method that will be approved by Lenders			mitigating impacts, installation and maintenance costs, etc.)	<p>monitoring results (consisting of monthly monitoring data collected throughout the first year of operation) and development of additional corrective actions (which have not been developed at the end of the each monthly monitoring campaign, if there is any) (start of operation is assumed as the date when T15, T16 and T17 start to operate)</p> <p>-Implementation of the;</p> <p>-Actions developed at the end of each monthly monitoring campaign within 3 months</p> <p>-Actions developed based on the complete set of the monitoring results (consisting of monthly monitoring data collected throughout the first year of operation) within 3 months after the end of the first year of operation (start of operation is assumed as the date when T15, T16 and T17 start to operate)</p>	<p>implemented</p> <p>-Grievance records, register and close-out forms</p> <p>-Documentation on the periodical engagement with the vulnerable PAP</p>	
5.5.	<p>In case the vulnerable PAP confirms his unwillingness to relocate; monitor compliance with Project standards after the implementation of actions</p> <p>- Monitor the noise impact through quarterly measurements</p>	<p>-Avoids adverse E&S impacts on PAPs and ensures good relationships with the stakeholders</p> <p>-Avoids risks due to unresolved/ unmanaged</p>	<p>-EBRD PR1, PR3, PR5, PR10</p> <p>-Good Practice</p>	<p>Project Company to ensure engagement with the PAP</p> <p>-Involvement of accredited laboratory required for noise</p>	<p>Within the second and third year of operation (start of operation is assumed as the date when T15, T16 and T17 start to operate)</p>	<p>-Quarterly noise monitoring results (monitoring to be performed by an accredited laboratory for 48 hours in each monitoring period)</p> <p>- Grievance Mechanism in place and implemented</p> <p>-Grievance records, register and close-</p>	

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	to be conducted by an accredited laboratory for 48 hours in each monitoring period during the second year of operation -Implement the Project Grievance Mechanism throughout the Project to collect grievances of the vulnerable PAP about noise and shadow flicker impact and blade/ice throw risk -Implement the SEP to periodically engage with the PAP about the Project risks and/or impacts	grievances		measurements during the second year of operation		out forms -Documentation on the periodical engagement with the vulnerable PAP	
					After the third year of operation until the end of loan duration as long as the vulnerable PAP remains a resident of the house located in the setback distance of T15	-Engagement with the vulnerable PAP through face to face meetings to be undertaken semi-annually	
5.6.	Implement Livelihood Restoration Plan	-Ensure livelihood restoration activities meet EBRD PR5 objective	EBRD PR 5	Project Company -Adequate financial and human resources for implementation of actions -External experts may be required for monitoring of LRP implementation	Within 1 month after Financial Close	-LRP in place and implemented -LRP budget allocated and spent	
5.7.	Commission a Completion Audit by independent expert(s) in order to verify that LRP/RAP implementation achieved the objectives of EBRD PR5	-Ensures verification of the fulfilment of LRP/RAP provisions	-EBRD PR 5 -EBRD's Resettlement Guidance and Good Practice	Project Company to commission independent LRP/RAP experts approved by Lenders Resources needs: -Adequate financial and human resources -Involvement of independent resettlement experts required for development of a RAP	Following completion of LRP/RAP implementation	-Completion Audit Report prepared by independent experts -Lenders approval of the completion of LRP/RAP implementation based on the Completion Audit Report or development and implementation of corrective actions	

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				for the vulnerable PAP as per EBRD PR5			
PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1.	<p>Continue bird activity monitoring throughout the construction phase of the Project including the first two years of operation, the monitoring would be continued by the Independent Ornithological Expert (IOE, refer to ESAP 6.4) during the loan duration. This will be revised every 3 years and tailored for needs by IOE</p> <p>The monitoring programme should include an adaptive management component and inform the need for additional or modified mitigation measures to avoid and/or reduce, or at a last resort offset/compensate for, impacts to birds and bats.</p> <p>Continue carcass study at the existing WPP and extend it to the Capacity Extension Project the first two years of operation and then to be executed by the IOE throughout the loan duration of the Project.</p> <p>Update the collision risk assessment for migratory and resident bird species as per the collected field data by end of 2020.</p> <p>In line with Before-After Impact Control approach, depending on the outcome of the field data and</p>	- Minimize birds' mortality	-EBRD PR6 -Best practice	<p>-Responsibility: Project Company; external experts (to conduct the field surveys)</p> <p>-Reasonable resources based on commercial offers: Adequate human resources; involvement of external experts as needed</p>	Seasonal surveys to continue starting from Spring 2020 for the first two years of operation. IOE to continue throughout the loan duration of the Project.	-Baseline field data on bird activity to be updated and overall risk assessment to be reported to the Lenders together with carcass results and integrated into the Biodiversity Action Plan	

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	<p>updated risk assessment at post-construction phase, implement active turbine management strategy including development of shut-down on demand protocol to ensure risks are mitigated associated with the turbines leading to injury or mortality of bird species, if necessary. Verify through field monitoring data the performance of active turbine management strategy.</p> <p>Implement habitat management and maintenance practices at the site level to reduce the risk of attracting collision-prone birds such as avoiding establishing ponds or waste sites within the development.</p> <p>Turbines and infrastructures will not offer perching or breeding opportunities for birds</p>						
6.2.	<p>Continue bat activity monitoring throughout construction phase of the Project including the first two years of operation, through the Independent Ornithological Expert (IOE, refer to ESAP 6.4). Continuation of the bat activity monitoring by the IOE throughout the loan duration of the Project will be decided according to the results of the first two years of operation results. Bat activity monitoring should be conducted between March and October and focus on monitoring at ground level and at height (if it is</p>	<p>Minimize bat injury and mortality</p>	<p>-EBRD PR6 -Best practice</p>	<p>-Responsibility: Project Company; external experts (to conduct the field surveys) -Resources needs involvement of external experts</p>	<p>Seasonal surveys to continue starting from Spring 2020 up until for the first two years of operation IOE to continue throughout the loan duration of the Project.</p>	<p>-Baseline field data on bat activity to be updated and overall risk assessment to be reported to the Lenders together with carcass results and integrated into the Biodiversity Action Plan</p>	

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	<p>technically possible to attach it to the turbine; if not, an alternative technically and financially feasible solution will be considered, evaluated and agreed with EBRD) with appropriate automatic bat detectors in order to determine the use of the airspace by different bat species. Transects monitoring can be suspended as it does not provide data useful to inform the mitigation strategy.</p> <p>Continue carcass monitoring at the existing WPP and extend it to the Capacity Extension Project for the first two years of operation between March and October. Continuation of the carcass monitoring by the IOE throughout the loan duration of the Project will be decided according to the results of the first two years of operation results.</p> <p>Conduct accurate statistical analysis of the data gathered in order to refine the understanding of the use of the airspace by bats within the existing and new wind farms, including correlations with key meteorological parameters (wind speed, temperature, humidity and precipitation). Data will need to be processed by an expert in statistical analysis and presented in detailed reports with original data annexed.</p>						

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	Prepare a comprehensive bat study report at the end of year 2020 and at the end of each year in 2021 and 2022, presenting the results of both the bat activity and the bat mortality studies to inform the implementation of the mitigation measures.						
6.3.	<p>Develop and implement Biodiversity Action Plan (BAP) for the management of flora and fauna species of conservation importance including implementation of in-situ and ex-situ measures as identified during the ESIA study and update the BAP as necessary following availability of new field data. The BAP will need to contain measures to ensure that a net-loss of Priority Biodiversity Features and a net-gain of Critical Habitat is achieved through the application of the mitigation hierarchy.</p> <p>As a living document BAP will be due for revisions and updates as the Project proceeds, allowing to reflect any additional measures required to be taken for conservation of habitats and species.</p> <p>BAP will be developed as a plan that clearly identifies the responsible parties that will be in charge of the updating the BAP, that will have the responsibility to determine if additional measure are needed and what these measures would be based on,</p>	Minimize impacts on species of conservation concern	-EBRD PR6 - Best practice	<p>-Responsibility: Project Company; external experts (to perform necessary actions in line with the BAP whenever required)</p> <p>-Resources needs: Adequate financial and human resources; involvement of external experts</p>	<p>Develop end of 2019</p> <p>The existing 2020 tentative biodiversity monitoring programme to be finalized, reviewed by the IOE and approved by the EBRD in Q1 2020, before the start of surveys in Spring 2020.</p> <p>Implement throughout construction and operation as required</p>	<p>-Written BAP in place and implemented</p> <p>-2020 tentative biodiversity monitoring programme finalized, reviewed by the IOE and approved by EBRD in Q1 2020.</p> <p>-BAP is updated whenever new data/information becomes available with respect to habitats and species</p>	

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	<p>define the KPIs that will trigger the need of additional measures. BAP will be developed to detail monitoring and auditing requirements throughout the Project lifespan.</p> <p>The scope of monitoring works to be reviewed by the IOE and approved by the EBRD before the start of surveys in Spring 2020.</p>						
6.4.	<p>The Company will appoint a qualified Independent Ornithological (for bird and bat) Expert (IOE) on a non-objection basis by the Lenders to provide independent expert advice on the seasonal bird and bat activity and carcass monitoring reports and provide input as per the active turbine management strategy of the Project.</p> <p>The IOE will be appointed by the Company throughout the Project loan duration. The expert will be employed during the migration periods (and have adequate experience). The IOE scope will be reviewed with the Lenders every 3 years</p> <p>Field monitoring data at post-construction will verify the performance of turbine management strategy for adaptive management to take place and will inform on the requirement of additional measures to be implemented.</p>	Minimize impacts to birds and bats	-EBRD PR6 - Best practice	<p>-Responsibility: Project Company; external experts (to perform necessary actions in line with the BAP whenever required)</p> <p>-Resources needs: Adequate for external experts</p>	To be appointed in Spring 2020	IOE appointed, Lenders to sign off on non-objective basis.	

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6.5.	<p>The Company will develop a turbine shut down protocol defining criteria and mechanisms to be used in taking shut down decisions by the IOE. Wind turbines will be shut-down based on a written Notice to Close issued by the IOE, although due to the requirement to provide immediate shut down in the field the first point of command will be via telecommunication links (Information on these instances will be provided to the Lenders within 3 days.)</p> <p>The IOE will provide written notice and keep a register of all such actions which will be immediately reported to the Lenders as well as local authorities upon request. Summary of information will be published annually.</p> <p>Cut-in wind speed will be set in the first instance at 5 m/s for the 10 existing wind turbines with highest bat mortality between April and October until the results of the studies described in 6.2 will allow to define more specific measures in terms of turbines involved, periods and cut-in wind speed.</p> <p>The installation of bat deterrents on existing turbines will be assessed and decided by the client based on a cost-benefit analysis. The bat studies on 6.2</p>	In order to reduce the risk of bird collisions, the wind farm will be shut down in the case of risk of bird collision.	EBRD PR6 - Best practice	<p>Responsibility: Project Company; external experts (to perform necessary actions in line with the BAP whenever required)</p> <p>IOE based on commercial contracts for 3 years.</p>	Before commissioning.	<p>IOE Appointed</p> <p>Report on number of turbines and hours shut down in annual report to Lenders.</p>	

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	<p>will allow to understand the effectiveness of the bat detectors on the existing turbines and to determine if they are a suitable alternative to the implementation of cut-in wind speed on the existing and new wind turbines.</p> <p>Free-wheeling i.e. free spinning of rotors under low wind conditions with no power generation, will be eliminated to the extent feasible in the case of the existing turbines.</p> <p>Turbines and infrastructures will not offer perching or breeding opportunities for bats.</p> <p>Additional conservation measures for bat species will be developed in case the results of monitoring of bat mortality will show significant effects. These measures might include support to bats conservation off-site like roosts protection and enhancement, and awareness raising at the local and national level in cooperation with local qualified experts.</p>						
PR7							
7.1.	Not applicable						
PR8	Cultural Heritage						
8.1.	Develop and implement the Cultural Heritage Management Plan (CHMP) and the Chance Find Procedure where necessary	<p>-Ensures compliance with national legislation and PR8.</p> <p>-Avoid risks on known</p>	<p>-National legislative requirements</p> <p>-EBRD PR8</p>	Project Company to ensure implementation by all direct and contracted Project	Development of the plan and procedure at least one month prior to start of construction (including	-Records of trainings provided to construction personnel regarding the implementation of Chance Find Procedure and CHMP are kept	

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		and unknown cultural heritage during construction.		personnel Resources needs: archaeologists/cultural heritage experts at construction sites; trainings provided to construction personnel	site preparation works) Implementation throughout the construction phase	-Chance Find Report Forms issued -Grievance Procedure in place and implemented	
PR9	Financial Intermediaries						
9.1.	Not applicable						
PR10	Information Disclosure and Stakeholder Engagement						
10.1.	Disclose the ESIA Package in line with the SEP and keep the disclosed documents on public domain throughout the life of the Project (including any necessary updates)	-Helps stakeholders understand the Project impacts and opportunities and allow them to contribute	-EBRD PR 1, PR10 -EBRD's Public Information Policy	Project Company and the Lenders (throughout the disclosure process) Resources needs: -Adequate information technologies (IT) infrastructure	ESIA Package disclosed in English and Turkish for 60 days, kept in the Project Company's website throughout the Project Life	ESIA Disclosure Package (EISA Report, NTS, SEP, LRP, ESAP, national EIA) available on Project Company's website (in English and Turkish)	
					Distribution of hard copies completed in line with SEP within 1 week following the start of ESIA Disclosure Process	Hard copies of ESIA Report, NTS, SEP and LRP (in Turkish) available at the substation site and other locations in line with the SEP	
10.2.	Implement the SEP throughout the Project	-Helps to maintain good relationships with all stakeholders and sharing information with the public as well as project personnel -Requires good planning/ management, assigning personnel with good communication skills, responsiveness and financial resources	-EBRD PR 1, PR10 -EBRD's Public Information Policy	Project Company to ensure implementation by the Company and relevant contractor personnel Resources needs: -Adequate financial and human resources	Implementation to start after Financial Close	-Up-to-date stakeholder engagement/consultation records (e.g. track sheets, logs, etc.) kept	
					Disclosure meetings to be held within the ESIA Disclosure Period as defined in the SEP	-Disclosure meetings conducted in line with the SEP and findings documented in the updated SEP -Periodic Environmental and Social Monitoring Reports submitted to Lenders (covering the status of SEP implementation)	
					Prior to start of construction phase	-Personnel with community liaison and grievance management responsibilities assigned	
10.3.	Update the SEP after the	-Helps to maintain good	-EBRD PR 1,	Project Company	Within 1 month after	-Updated SEP in place	

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	completion of ESIA disclosure period to reflect the disclosure events conducted during the disclosure period	relationships with all stakeholders and sharing information with the public as well as project personnel -Requires good planning/management, assigning personnel with good communication skills, responsiveness and financial resources	PR10 -EBRD's Public Information Policy	Resources needs: -Adequate human resources	Financial Close		
10.4.	Implement Grievance Mechanism in line with the SEP throughout the Project	-Effective implementation of the mechanism is essential to avoid any risk due to unresolved/unmanaged grievances -Implementation of the grievance mechanism by construction contractors is required to be controlled and strictly monitored -Ensures continuous improvement of environmental and social performance and helps to good relationships with the stakeholders/local communities	-EBRD PR 1, P10	Project Company to ensure implementation by the relevant Company and contractor personnel Resources needs: -Adequate financial and human resources -Provision of necessary tools (grievance boxes, etc.) provided at locations identified in the SEP -Information provided to the local communities about the presence and functionality of the grievance mechanism	Prior to start of construction (including site preparation works)	-Grievance Procedure in place and implemented -Grievance boxes, forms and guidance documents posted/placed at public places including public places commonly visited by women	
					Start with construction and maintained throughout the Project life	-Records on grievance registry and close-out are kept systematically -Specific personnel assigned for the management of grievances -All Project-related grievances are processed, managed/resolved as appropriate within the timeframes defined in the Project SEP -Periodic Environmental and Social Monitoring Reports submitted to Lenders (covering the information on grievance received, actions taken, resolved/unresolved actions, etc.)	
					-Within one week after the commencement of employment for relevant direct and contracted Project personnel (individually or collectively as appropriate)	-Training on the implementation of Grievance Mechanism provided to all relevant direct and contracted Project personnel	

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					-To be refreshed annually during the operation phase)		
10.5.	Undertake on-going reporting to public on Project's E&S performance with periodical report published on Project Company's website	-Helps stakeholders receive transparent and up-to-date data on Project's E&S Performance directly from Project Company	-EBRD PR 1, PR10 -EBRD's Public Information Policy	Project Company Resources needs: -Adequate information technologies (IT) infrastructure	Published on Project Company's website: -Semi-annually in construction -Annually in operation	Periodical public reports on Project's E&S performance published on Project Company's website	