



# **KIYIKOY WIND POWER PLANT CAPACITY EXTENSION PROJECT**

## **Livelihood Restoration Plan (LRP)**

**ALENKA Enerji Uretim ve Yatirim A.Ş.**

**October 2019**

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## ABBREVIATIONS

Abbreviation	Definition
ALENKA	ALENKA Enerji Üretim ve Yatırım A.Ş.
asl	Above Sea Level
BEE	Borusan EnBW Enerji Yatırımları ve Üretim A.Ş.
BD	Borusan Danışmanlık Ortak Hizmetleri A.Ş.
CLO	Community Liaison Officer
CORINE	Coordination of Information on the Environment
CSR	Corporate Social Responsibility
E&S	Environmental and Social
EBRD	The European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EMRA	Energy Market Regulatory Authority
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ETL	Energy Transmission Line
GEM	GEM Sustainability Services and Consultancy Inc.
HQs	Headquarters
LRP	Livelihood Restoration Plan
MoEU	Ministry of Environment and Urbanization
NGO	Non-governmental Organisation
PAP	Project Affected Person
PR	Public Relations
PR	Performance Requirement
Project Company	ALENKA Enerji Üretim ve Yatırım A.Ş.
SEP	Stakeholder Engagement Plan
SRM	Social Risk Management Consultancy Limited Company
SPV	Special Purpose Vehicle
The Bank	The European Bank for Reconstruction and Development
WPP	Wind Power Plant

## 1. INTRODUCTION

Kiyikoy Wind Power Plant ("Kiyikoy WPP" or the "Plant") is located in Vize district of Kırklareli province in the northwestern part of Turkey. ALENKA Enerji Üretim ve Yatırım A.Ş. ("ALENKA" or the "Project Company"), a special purpose vehicle (SPV) established for the development of the Project by the previous owner of the Project, has been operating the first phase of the Kiyikoy WPP with an installed capacity of 28 MWm/27 MWe (14 turbines, 2 MWm each) since August 2014.

On 1 December 2017, Borusan EnBW Enerji Yatırımları ve Üretim A.Ş. and Borusan Danışmanlık Ortak Hizmetleri A.Ş. (jointly referred to as "Borusan" or "BEE") acquired the Kiyikoy WPP from its previous owner, AKSA Enerji Üretim A.Ş., and became the sole owner of the Project.

BEE, through the Project Company, considers increasing the total installed capacity of the Project to 100 MWm/99 MWe as part of the Kiyikoy WPP Capacity Extension Project (the "Capacity Extension Project"). Accordingly, the Project Company plans to construct and operate an additional capacity of 72 MWm/72 MWe. The Project Company initially considered 21 turbines, but the technological advancements have allowed the Company to build and operate this additional capacity with 20 turbines, each having a capacity of 3.6 MWm. Following the construction and commissioning of the Capacity Extension Project, the Kiyikoy WPP will have a total installed capacity of 100 MWm/99 MWe to be provided by a total of 34 turbines (including the existing 14 turbines and the 20 new turbines to be built and operated as part of the Capacity Extension Project)<sup>1</sup>.

BEE is considering international and national finance for the implementation of the Project. The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") as the potential lender of the Project, has assigned the Kiyikoy WPP Capacity Extension Project as Category A as it involves further expansion and development of a greenfield WPP located close to a major bird migratory route (via Pontica).

GEM Sustainability Services and Consultancy Inc. ("GEM") has been retained in March 2019 to undertake a comprehensive Environmental and Social Impact Assessment (ESIA) process for the Project. The social baseline, assessment and reporting studies have been conducted by the Social Risk Management (SRM) Consultancy Limited Company ("SRM") contracted by GEM.

The Capacity Extension Project entails land acquisition for the construction of new turbines and site access roads<sup>2</sup>. This triggers EBRD's Environmental and Social (E&S) Policy and Performance Requirement (PR) 5 on Land Acquisition, Involuntary Resettlement and Economic Displacement. The current Project involves economic displacement only<sup>3</sup>, which has required the Project Company to develop and implement a Livelihood Restoration Plan (LRP). Should the Project require relocation of houses for the mitigation of E&S impacts in order to ensure compliance with EBRD PRs, the livelihood compensation and/or assistance measures specified in this LRP will be incorporated into a Resettlement Action Plan that will address and compensate the impacts associated with physical displacement.

This LRP has been prepared for the Kiyikoy WPP Capacity Extension Project as part of the ESIA process in order to fulfil the requirements of EBRD PR5.

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<sup>1</sup> As of August 2019, the Company is in the process of selecting the ultimate 20 turbines to be built and operated as part of the Project; as such one of the 21 turbines considered in the initial Capacity Extension Project will be eliminated before the finalisation of the Project design.

<sup>2</sup> The Project will utilise the current substation and the Energy Transmission Line (ETL) of the existing Kiyikoy WPP, thus no additional land acquisition is required for Project's connection to the national grid.

<sup>3</sup> There are no residential houses (seasonal or permanent) or structures used as shelter that would be lost on the parcels to be acquired for the Capacity Extension Project.



The LRP depicts the impacts of Project-related land acquisition (e.g. land lost by Project Affected Persons (PAPs), restrictions on land use<sup>4</sup> and access to assets) present legal framework, identify gaps between EBRD PR5 and national legal framework, devise entitlement matrix to mitigate the gaps, define compensation mechanisms, illustrate stakeholder consultations related to land acquisition to date, present the grievance mechanism that will be applicable to the Project and the Project-related land acquisition process to ensure that the entitlements are provided in a transparent, consistent and equitable manner, and establish a monitoring and evaluation mechanism that will warrant effective implementation of this LRP .

This LRP will be applicable until the end of second year of the operation of Capacity Extension Project. It will be reviewed and updated by the Project Company as needed, at least annually throughout its implementation. It should be read in conjunction with the ESIA Report and the E&S Management Plans developed for the Project.

### 1.1. Objectives of the LRP

The objectives of this LRP are:

- to avoid and minimise economic displacement to the extent possible;
- to depict Project's land acquisition impact, and identify Project's potential implications associated with economic displacement;
- to specify the legislative framework applicable to the acquisition of immovable assets;
- to summarise the stakeholder relationships the Project has provided for land acquisition;
- to establish eligibility framework;
- to illustrate the valuation framework;
- to describe grievance procedures;
- to present detailed implementation schedule of the Project;
- to design the monitoring and assessment framework for restoration of incomes/livelihoods.

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<sup>4</sup> The majority of the License Area and the land to be acquired for the construction of new turbines and access roads is situated on state forest land. The number of privately-owned parcels to be affected by the Project-related land acquisition is three (Parcel no. 129/27 and 129/32 registered in Kiyikoy and located along the main access road of the Project; and Parcel no.101/206 registered in Kislacik and located at the footprint of the foundation of Turbine 15 (T15)). One (1) pasture parcel (Parcel no. 319/1) will be affected by the Project-related land acquisition in Kiyikoy.

## 1.2. Structure of the LRP

Contents of this LRP, including this Chapter, cover the following:

- Chapter 1: Introduction
- Chapter 2: Project Description
- Chapter 3: Project Impacts
- Chapter 4: Institutional and Legal Framework
- Chapter 5: Roles and Responsibilities
- Chapter 6: Livelihood Restoration and Compensation
- Chapter 7: Implementation Time Frame
- Chapter 8: Stakeholder Consultations and Disclosure of Information
- Chapter 9: Grievance Mechanism
- Chapter 10: Monitoring and Reporting
- Chapter 11: Implementation Costs

## 2. PROJECT DESCRIPTION

### 2.1. Project Background

The Energy Market Regulatory Authority (EMRA) granted an Energy Generation License ("License") to the Project on 4 April 2007 ("License Date") on behalf of the Project Company. This License (License No: EU/1149-3/823) has authorized the Company for electricity generation for 49 years ("License Duration") starting from the License Date.

The Project Description File (PDF) was prepared in line with the Environmental Impact Assessment (EIA) Regulation in force for the first phase of the Project ("existing Kiyikoy WPP Project") with an installed capacity of 28 MWm/27 MWe provided by 18 turbines (each turbine with a capacity of 1.5 MW). An "EIA not Required" Decision was secured from the Kırklareli Provincial Directorate of Environment and Urbanization (the provincial organisation of the Ministry of Environment and Urbanization – MoEU) on 8 May 2009 (Decision No: 2009/07).

Following the "EIA not Required" Decision, the site wind measurements continued leading to the optimization of the Project design. The final design completed by the Project Company based on the optimisation analyses included 14 turbines (2 MWm each) providing the same total installed capacity of 28 MWm/27 MWe. The Project Company applied to the MoEU and obtained an official letter on 2 May 2013 confirming that the "EIA not Required" Decision granted on 8 May 2009 is valid for the final design with 14 turbines (2 MWm each) as the total installed capacity of the Project has not changed.

In August 2014, the existing Kiyikoy WPP Project started commercial operation. Following this, the potential for a capacity extension was assessed by the Project Company and it was concluded that the installed capacity of the WPP can be extended up to 100 MWm/99 MWe with the construction and operation of 20 additional turbines (3.6 MWm each) making a total of 34 turbines.

The EIA Regulation in force required an EIA Report to be prepared for the Capacity Extension Project. The Project Company made an EIA application to the MoEU. Upon completion of the EIA process, the MoEU granted an "EIA Positive Decision" on 14 September 2017 (Decision No: 4763) to the Kiyikoy WPP Capacity Extension Project. The "EIA Positive Decision" has allowed the Company to increase the existing capacity of the Kiyikoy WPP from 28 MWm/27 MWe to 100 MWm/99 MWe.

Following the "EIA Positive Decision", the coordinates and/or codes of certain turbines have changed as a result of the Project development and ongoing license amendment process with the EMRA. The Project Company applied to the MoEU and obtained an official letter on 25 January 2019 confirming that the "EIA Positive Decision" granted for the Capacity Extension Project on 14 September 2017 is valid for the revised coordinates of the turbines and a total capacity of 100.45 MWm/99.45 MWe.

As of September 2019, pre-construction planning and final design and engineering studies as well as national permitting process are ongoing for the Project. According to the current schedule, the construction phase is planned to be started in Q3 2019. The Capacity Extension Project is planned to be taken into operation in Q4 2020.

It is anticipated that there will be 100 personnel working on site at the peak period of construction activities, of which 35% is anticipated to be unskilled. Contractors will be contractually required to maximise use of local workforce, especially by utilising the experienced and qualified workforce available in Kiyikoy. There will be no on-site accommodation of the construction workforce.

## 2.2. Project Location

Kiyikoy WPP Project is located within the administrative borders of Vize district of Kırklareli province. Vize has a population of 28,122 people, of which 49 percent being urban and 51 being percent rural population (*TürkStat, 2018*).

The License Area, specified in the Energy Generation Licenses issued by the EMRA, covers 2,453.3 ha. It is located approximately 65 km (air distance) southeast of the Kırklareli city centre and 25 km northeast of the Vize district centre. The License Area, turbine locations and the surrounding settlements and roads are shown in [Figure 2-1](#).

The closest settlement to the License Area is Kiyikoy town, which comprises Cumhuriyet, Kale and Guven neighbourhoods. The settlements located in the surroundings of the License Area (within a 10 km radius) and the distance of the settlement centres to the License Area boundary are listed in [Table 2-1](#).

**Table 2-1. Settlements Located near the License Area**

Settlement	District	Air Distance of the Settlement Centre to the License Area Border (km)	Direction of the Settlement with Respect to the License Area
Kiyikoy town	Vize	2.2	Southeast
Hamidiye town	Vize	3.6	West
Aksicim town	Vize	4.2	Southwest
Kislacik town	Vize	5.2	West-northwest
Balkaya town	Vize	8.1	Southwest

Access to the Project site is provided through the centre of Saray district located in Tekirdag province. From Saray district centre, the Saray-Kiyikoy road is followed for about 25 km, which diverges to the north in the direction of the existing Kiyikoy WPP. From this point, the stabilised forest road is followed for about 12 km to access the site through the existing main access road of the operational Kiyikoy WPP.

The License Area is located at the coast of Black Sea. The elevations (above sea level - asl) within the License Area range between 135 m (north-western part) and 20 m (southern part). The majority of the License Area is situated on state forest land, where there are patches of parcels registered as agricultural, pasture, raw soil.

There are few buildings/structures located within the Project License Area. The closest building/structure to the turbines is located approximately 200 m north of T15, which is situated on a registered agricultural parcel outside the Project's land acquisition area according to the current design.

The License Area falls within the boundaries of Istranca Mountains Key Biodiversity Area (KBA) and located on the "Via Pontica" bird migration corridor along the west coast of the Black Sea. Via Pontica is a major route for raptors in the region. This said, there are no migratory soaring birds that qualify the Istranca Mountains KBA.



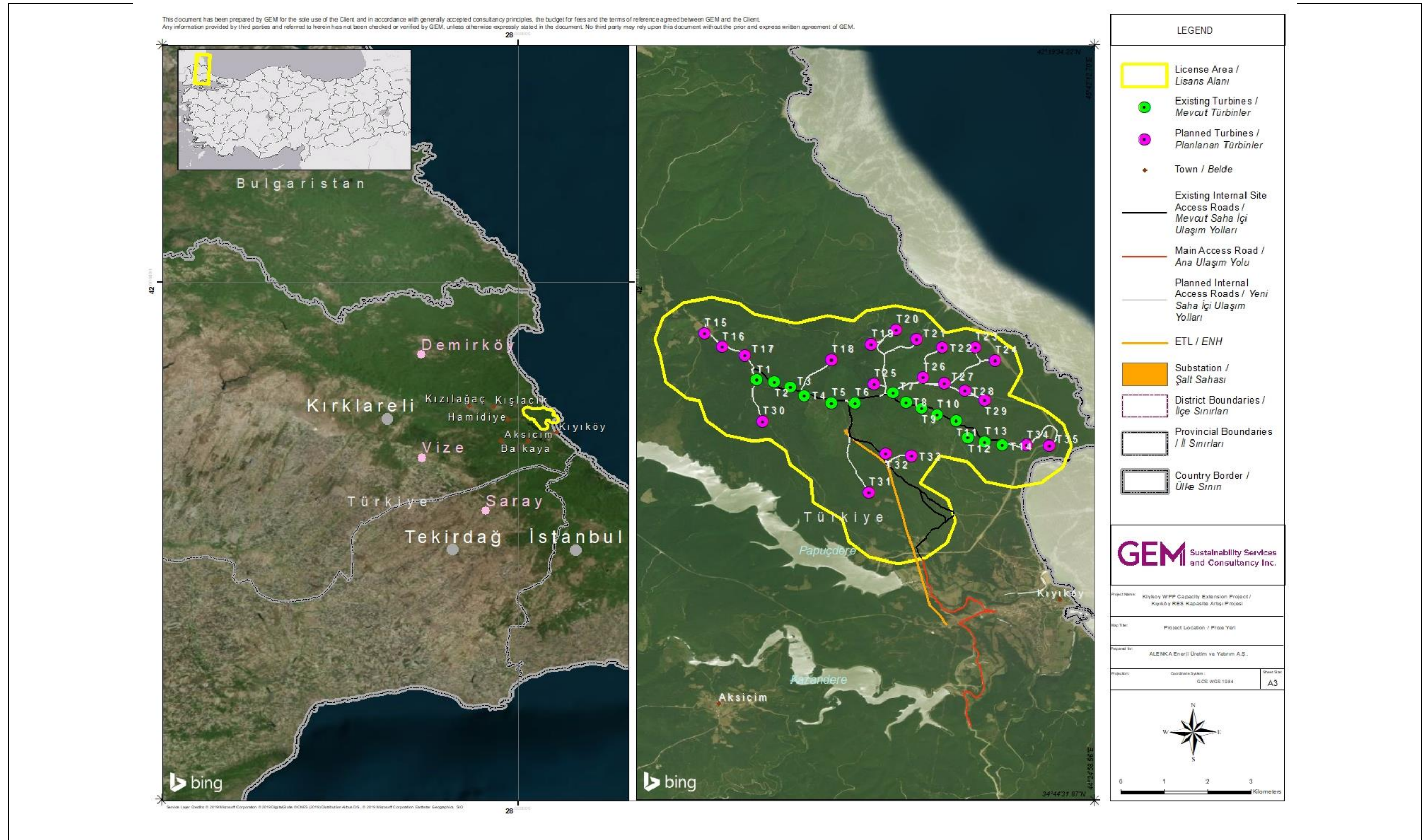


Figure 2-1. Project Location

### 2.3. License Area and Project's Land Use

The License Area, specified in the Energy Generation Licenses issued by the EMRA, covers 2,453.3 ha. According to the public information system of the General Directorate of Land Registry and Cadastre, majority of the License Area is situated on state forest land, where there are patches of parcels registered as agricultural, pasture, raw soil.

The land cover distribution of the License Area according to the Coordination of Information on the Environment (CORINE) is presented in Table 2-2. The majority of the License Area (96%) is covered with broad-leaved forests.

**Table 2-2. Land Cover Distribution within the License Area (According to CORINE)**

Level 1	Level 2	Level 3	Area (ha)	Percent (%)
Agricultural areas	2.4. Heterogeneous agricultural areas	2.4.3. Land principally occupied by agriculture, with significant areas of natural vegetation	42.9	1.8
Forest and semi natural areas	3.2. Scrub and/or herbaceous vegetation associations	3.2.4. Transitional woodland-shrub	32.6	1.3
Forest and semi natural areas	3.1. Forests	3.1.1. Broad-leaved forest	2,354.0	96.0
Water bodies	5.2. Marine waters	5.2.3. Sea and ocean	23.8	0.9
<b>Total</b>			<b>2,453.3</b>	<b>100.00</b>

The area covered by the Existing Kiyikoy WPP and Capacity Extension Project units and the corresponding land cover types according to CORINE (2012) are summarised in Table 2-3. The Capacity Extension Project's land requirement is 25.9 ha, of which 96% (24.9) corresponds to forests. The cumulative land requirement of the Existing Kiyikoy WPP and Capacity Extension Project units is 39.3 ha.

**Table 2-3. Summary of the Land Use at the Footprint of Project Units (according to CORINE 2012)**

Project Units	Exiting Kiyikoy WPP Project Footprint Area (ha)			Capacity Extension Project Footprint Area (ha)			Cumulative Area (ha)			
	Agriculture (2.4.3. Land principally occupied by agri., with sig. areas of nat. veg.)	Forests (3.1.1. Broad-leaved forest)	Total	Forests (3.1.1. Broad- leaved forest)	Shrubs (3.2.4. Transitional woodland- shrub)	Total	Agriculture (2.4.3. Land principally occupied by agri., with sig. areas of nat. veg.)	Forests (3.1.1. Broad-leaved forest)	Shrubs (3.2.4. Transit. woodland- shrub)	Total
Turbines	0.0	4.5	4.5	12.8	0.6	13.4	0.0	17.3	0.6	<b>17.9</b>
Access Roads	0.5	7.6	8.1	12.1	0.4	12.5	0.5	19.7	0.4	<b>20.5</b>
Substation	0.0	0.8	0.8	0.0	0.0	0.0	0.0	0.8	0.0	<b>0.8</b>
<b>Total</b>	0.5	13.0	<b>13.5</b>	24.9	1.0	<b>25.9</b>	0.5	37.8	1.0	<b>39.3</b>

*\*Minor digit differences are caused by rounding.*

### 3. PROJECT IMPACTS

The social studies and assessment of potential social impacts of the Kiyikoy WPP Project as part of the ESIA was based on a combination of secondary research (desktop study) and field data. The social study area and the key social elements relevant to the Project are delineated in Figure 3-1.

A comprehensive field study program comprising key informant meetings, interviews with the Project Affect Persons (PAPs) focus group meetings and meetings with the local governmental and non-governmental stakeholders as well as internal stakeholders of the Project has been undertaken within the social study area.

#### 3.1. Land Acquisition Overview

The Project-related land acquisition will partially affect two state-owned forest parcels and three privately-owned (agricultural) parcels registered in Kiyikoy town (Population in 2018: 2,180) and Kislacik village (Population in 2018: 650). There is also a single pasture parcel that will be partially acquired for the Project in Kislacik village. Land acquisition impact of the Capacity Extension Project is summarised in Table 3-1. Majority of the land to be acquired for the Project (more than 97% in terms of area in ha) corresponds to state-owned forests.



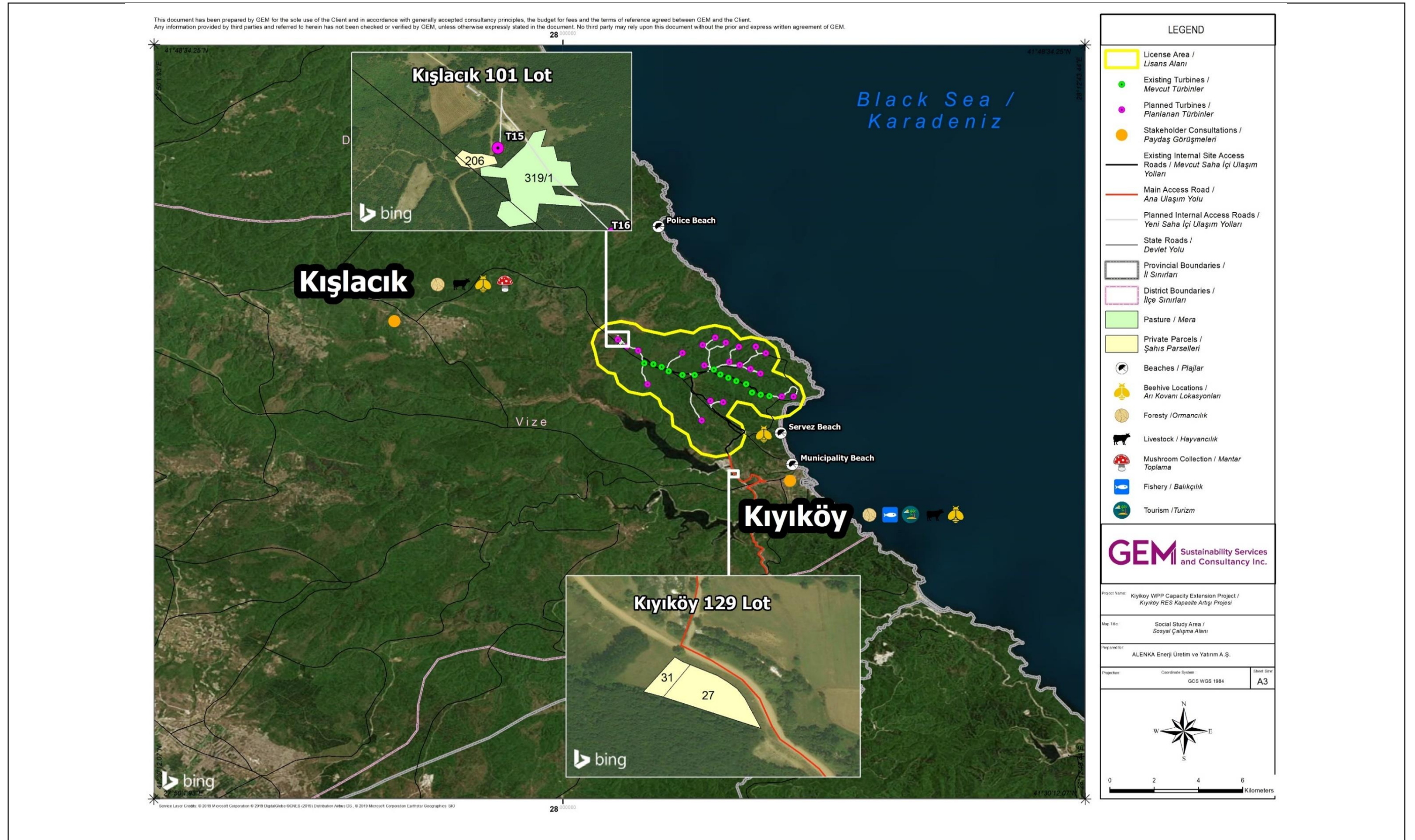


Figure 3-1. Social Study Area

**Table 3-1. Summary of Land Acquisition Impact for Kiyikoy WPP Capacity Extension**

Land Use Type	Parcels Acquired by the Project (Lot/Parcel No.)	Acquired Area of the Affected Parcels	Impact at License Area Level		Impact at Parcel Level		Impact at Settlement Level	
			License Area	Ratio of the Affected Part of the Parcels to the License Area	Total Area of the Parcels Acquired by the Project	Ratio of the Affected Part of the Parcels to the Total Area of the Parcels Acquired by the Project	Total Area of the Parcels with Same Land Use Type (with the Parcels Acquired by the Project) in the Affected Settlements (Kiyikoy and Kislacik)	Ratio of the Affected Part of the Parcels to the Total Area of the Parcels with Same Land Use Type (with the Parcels Acquired by the Project) in the Affected Settlements (Kiyikoy and Kislacik)
Forest land	101/246 (Kislacik) 325/1 (Kiyikoy)	24.9 ha	2,453.3	%1.0	8,444.0 ha	%0.3	12,139.0 ha	%0.2
Privately-owned Parcels	129/27 (Kiyikoy) 129/32 (Kiyikoy) 101/206 (Kislacik)	0.5 ha		%0.02	1.0 ha	%50.0	83.3	%0.6
Pasture Parcels	319/1 (Kislacik)	1.1 ha		%0.04	4.5 ha	%24.5	42.9 ha	%2.6

## 3.2. Land Affected by Project-related Land Acquisition

### 3.2.1. State-owned Forest Land

Total forest area of Kiyikoy and Kislacik is 12,139 hectares (*Kiyikoy Forestry Sub-district Directorate, 2019*), which consists of mainly oaks. According to the related Forestry Management Plan, the Kiyikoy WPP License Area corresponds to mainly Forest Products Production Function, which serve for forestry product production. The area of the state-owned forest land that is/will be affected by the footprint of the Project units is summarized in [Table 3-2](#).

**Table 3-2. State-owned Forest Land Affected by the Footprints of the Project Units**

Project Units	Exiting Kiyikoy WPP Project Footprint Area (ha)	Capacity Extension Project Footprint Area (ha)	Cumulative Area (ha)
	Forests (3.1.1. Broad-leaved forest)	Forests (3.1.1. Broad-leaved forest)	Forests (3.1.1. Broad-leaved forest)
Turbines	4.5	12.8	17.3
Access Roads	7.6	12.1	19.7
Substation	0.8	0.0	0.8
<b>Total</b>	<b>13.0</b>	<b>24.9</b>	<b>37.8</b>

The forest area that will be impacted by the construction of the new turbines and access roads consists of 1% of the total License Area (2,453.3 ha) and 0.2% of the total forest area of Kiyikoy and Kislacik settlements (12,139 ha). Thus, the Project's impact on forest resources is very limited.

### 3.2.2. Privately-Owned Parcels

There are three privately-owned parcels to be affected by the Project-related land acquisition. The affected areas of these parcels are listed in [Table 3-3](#). Only the parcel in Kislacik (101/206) has a single owner, who resides in Vize (District centre). The other affected privately-owned parcels in Kiyikoy have multiple shareholders, and only 1 of the shareholders is a permanent resident in Kiyikoy.

**Table 3-3. Privately Owned (Agricultural) Parcels being Acquired by the Project**

Parcel no.	Registry Settlement	Type of Parcel (as specified in the Land Registry System)	Project Unit that requires Acquisition of the Parcel	Number of Share holders	Total Parcel Area (m <sup>2</sup> )	Affected Parcel Area (m <sup>2</sup> )	Percentage of the Affected Area of the Parcel (%)
129/27	Kiyikoy	Agriculture	Main access road	5	4,560.00	2,005.17	44.0
129/31	Kiyikoy	Agriculture	Main access road	6	1,242.00	1,126.91	90.7
101/206	Kislacik	Agriculture	T15	1	5,025.71	2,357.90	46.9
<b>Total</b>				<b>12</b>	<b>10,827.71</b>	<b>5,489.98</b>	



### 3.2.3. Pasture Parcels

The total size of the Kiyikoy pasture area is 429 decares, consisting of 19 parcels (*Vize Regional Directorate of Forestry, 2019*). Among this, only 1 pasture parcel (Parcel no. 319/1) will be affected by the Project (26% of the total parcel area will be affected) (see [Table 3-4](#)). According to the land registry, the total land size of this affected pastureland is 45 decares and the part that will be affected is 11.8 decares (approximately 26% of the total parcel area; 33.2 decares will remain unaffected). There is no pastureland in Kislacik village.

**Table 3-4. Pasture Parcel being Acquired by the Project**

Parcel no.	Registry Settlement	Type of Parcel (as specified in the Land Registry System)	Total Parcel Area (m <sup>2</sup> )	Affected Parcel Area (m <sup>2</sup> )	Unaffected Parcel Area (m <sup>2</sup> )	Percentage of the Affected Area of the Parcel (%)	Project Unit that requires Acquisition of the Parcel
319/1	Kislacik	Pasture	44,981.00	11,804.08	33,182.92	26.2	T15

There is no grazing prohibition for bovine and ovine animals in the forest areas. The field surveys revealed that the PAPs prefer utilising forest land for grazing.

## 3.3. Project Affected Persons (PAPs)

### 3.3.1. Users of Forest Land within the License Area

#### 3.3.1.1. Forestry Activities

Forest is being used actively by local people living in Kiyikoy town and Kislacik village for forestry activities. Forest land is used for supplying firewood, production of oak charcoal, working in the forest and sale of steres of wood, mushroom gathering and beekeeping.

Field study revealed that PAPs generate income from the forest land located in Kiyikoy and Kislacik directly by oak charcoal production, market sales and planted tree sale (the last two is regulated and managed by related Forestry Directorate). The development cooperatives in Kislacik and Kiyikoy<sup>5</sup> inform their members of Forestry's annual management plans, and designated areas and marked trees for cutting.

The forest land that will be affected by the construction of Capacity Extension Project units will be very limited (see Section 3.2.1), when compared to the forest land available in the remainder of the License Area and in the Kiyikoy town and Kislacik villages. In addition, the land to be acquired for the Project will not impede or restrict PAPs' access to common resources during the operation phase as the License Area or the Project units except the existing substation site will not be fenced. Thus, the Project is not anticipated to cause economic displacement for the local people using the forests for income generating activities.

It should be noted that, the clearance of forest cover will be conducted through local development cooperatives in agreement with the related Forestry Directorate, generating income for the local people who will be involved in the clearance activities.

<sup>5</sup> Kiyikoy Development Cooperative has 650 members, and Kislacik Development Cooperative has 400 members.

### 3.3.1.2. Mushroom Gathering

Women of Kislacik derive a significant income from mushroom gathering and sale from the forest land located in their settlement. According to the information obtained from the Regional Directorate of Forestry, total of 3 million TL sales were made in 2018 from mushroom sales.

There are two seasons for mushroom gathering. Spring season starts in May; and lasts for a month. Autumn season is October to November. Mushrooms are sold to the merchants; which export these products mostly to European countries (Germany, Italy, etc.). Apart from Boletus mushroom, women collect and sell many other types of mushrooms like Sigirdili (*hydnum repandum*), Zurna, Kazayagi (*cantharellus cibarius*), Gelinyanagi (*amanita caesarea*). Collected mushrooms are sold daily to the merchants that come to the village. Lack of a cold storage facility of adequate capacity that would allow the local people keeping mushrooms in favorable conditions and selling them when market conditions allow for higher incomes to be earned, enforces them to sell mushrooms at lower prices to avoid perishing of mushroom collected

In addition to Kislacik, people from the surrounding settlements and Istanbul come to the Kislacik forest during mushroom season to gather and sell mushrooms. These people from outside the village stay in their vehicles, or camp in the forest to collect and sell the mushrooms to wholesalers. The villagers stated that they are not bothered by outsiders because the forest is abundant with mushrooms; and there are enough mushrooms for everyone to collect.

Mushrooms are gathered twice a year; during spring and autumn seasons (May for spring and October-November for autumn).

The forest area to be acquired for the construction of Capacity Extension units is very limited when compared to the ample forest land available in Kislacik village. As the License Area or the Project units except the existing substation site will not be fenced, the Project will not cause any restriction to access to the forest land. Hence, the Project is not anticipated to cause any impact on mushroom gathering activities of Kislacik villagers. Moreover, mushroom collection is done on foot and through manual labour and women mushroom gatherers who were consulted during field study stated that they collect mushroom close to their village in order to sell it quickly. They also informed that the forest is abundant with mushrooms, and Project impacted area is not their mushroom collection zone.

Therefore, the Project is not anticipated to cause economic displacement for mushroom gatherers. On the other hand, the Project Company considers providing support to mushroom gatherers through the Corporate Social Responsibility (CSR) Plan to be developed and implemented.

### 3.3.1.3. Beekeeping

According to the data of the Vize District Directorate of Agriculture (2019), there are a total of 18 beekeepers, 12 in Kislacik and 6 in Kiyikoy, who have a total of 1,276 beehives. Entrance of external beekeeper entrance to the region is not allowed. Beekeepers can place their beehives wherever they want in the forest land.

In the field studies conducted by the external flora expert and the cultural heritage experts as part of the ESIA process, it has been identified that there are no active beehives and beekeeping activities within Project's License Area. However, there are beehives located outside the License Area, around 1.7 km south of T34, adjacent to an existing forest road in the vicinity of the Turk Stream project site. The air quality modelling results conducted as part of the ESIA (ESIA Report, Chapter 7 "Air Quality and Greenhouse Emissions") show that the Project's construction activities will not cause any significant dust effect at the location of any existing beehives. The noise modelling studies conducted as part of the ESIA (ESIA Report, Chapter 6 "Noise") also show that the noise effect caused by construction activities will not cause any significant impact at these locations. The Project is not likely to result in any impact on livelihoods sourced from beekeeping. The existing forest road on which the beehives are located is not an access road planned to be used for Project-related transportation.

During the ESIA consultations, the Beekeepers Association shared the beehive locations, and information on the techniques for honey production. In the field interviews/focus group meetings with the beekeepers, it has been identified that there are no beehives in the capacity extension turbine construction areas. Nevertheless, it is important to keep the beekeepers in Kiyikoy notified about the construction sites and schedule through the implementation of Project SEP so as to ensure that the beekeepers are well informed about the upcoming activities and the exact locations of the turbines and potential future beehives are placed outside the impact area of the construction activities throughout the temporary construction duration. During focus group meeting with beekeepers, it has been identified that there has not been a complaint or negative feedback on existing turbines' impact on beekeeping in the region until today. Consultations with the local beekeepers will continue in line with the Project SEP throughout the Project construction and operation phase, as necessary.

### 3.3.2. Impacts on Owners/Users of the Affected Privately-owned Parcels

As described in Section 3.2.2, three private parcels registered in Kiyikoy and Kislacik are affected by the Project related land acquisition. All these parcels are registered in the national Land Registry System as agricultural parcels. Only the parcel in Kislacik has single owner who resides in Vize (District centre). The parcels in Kiyikoy have multiple shareholders, and only 1 of the shareholders is a permanent resident in Kiyikoy.

**Table 3-5. Number of PAPs for the Privately-owned Parcels to be Acquired for the Capacity Extension Project**

Parcel no.	Settlement of Registry	Type of Parcel (as specified in the Land Registry System)	Project Unit that requires Acquisition of the Parcel	Current Status of Use	Number of Shareholders
129/27	Kiyikoy	Agriculture	Main access road	No users	5
129/31	Kiyikoy	Agriculture	Main access road	Uncultivated; used for grazing	6
101/206	Kislacik	Agriculture	T15	Uncultivated	1
<b>Total</b>					<b>12</b>

#### *PAPs in Kiyikoy*

There are 5 shareholders of the 129-27 numbered parcel in Kiyikoy. The names of the shareholders are not known or recognised by the Mukhtar and other residents. There are no identified users of this parcel<sup>6</sup>. One of the main reasons for issues with owner/user identification related to parcel information is the history of the area. Most of the lands in the area were allocated to Balkan immigrants by the State. The migrants that did not want to settle, continued to migrate to other parts of Turkey/Europe leaving their land.

There are 6 shareholders of the 129-31 numbered parcel in Kiyikoy. Only one of the shareholders of this parcel lives in Kiyikoy, who is the only user of the Parcel 129-31. The names of the other shareholders are not recognized by neither the residents nor the mukhtar. In-depth interview was conducted with the son of the shareholder living in Kiyikoy since shareholder was not available. The land acquired by the Project is not cultivated, yet the grass is used by the shareholder/shareholder's son for grazing purposes (as animal feed). The PAP has 5 bovine animals, but the main source of income is forestry activities. The son of the parcel's shareholder also said that he has another 5-10 decares of inherited land from his parents. He requests the full parcel to be acquired, which is subject to evaluation and approval of the governmental authority responsible from execution of expropriation. This PAP, who is the actual user of Parcel 129-31 would be the only PAP who may be subject to partial economic displacement. He will be sharing the land acquisition compensation with other shareholders, who do not use the land.

<sup>6</sup> The location of the parcel was shared with mukhtar, residents, beekeepers on title-deed mobile registry system to assess users (parcel inquiry application of General Directorate of Land registry and Cadastre) of the parcels.

### PAPs in Kislacik

The owner of the affected parcel in Kislacik (101/206) does not reside in Kislacik (lives in Vize district centre). According to information received from the Mukhtar and the residents of Kislacik, the owner has more than 100 decares of land in the area and engages in agriculture. The parcel impacted by the Project is not used for any agricultural activity; and there are no users of the land. Land is left uncultivated.

### 3.3.3. Impacts on Users of Pasture Lands

There is a single pasture parcel (Parcel no. 319/1) that will be affected by the Project in Kiyikoy as described in Section 3.2.3) (26% of the total parcel area will be affected) (see Table 3-4). There are no buildings (shed, porch, trough etc.) on this pasture parcel. It has been stated during the ESIA field surveys that households whose income depends on animal husbandry use this pasture for animal grazing. This parcel is located approximately 8 km (air distance) northwest of Kiyikoy town centre and used by some of the ovine breeders.

It has been stated in the interviews conducted with the mukhtars during the ESIA field surveys that there are 30 households with 4 or more bovine animals and 20 households with 10 or more ovine animals in Kiyikoy (see Table 3-6). Pasture is only used for ovine grazing. According to the data obtained from the District Directorate of Agriculture as part of the social field surveys, there are 20 households engaged in ovine breeding in Kiyikoy, who potentially use the partially affected pasture parcel for part of their ovine breeding activities.

**Table 3-6. Number of Households Engaged in Ovine Breeding in Kiyikoy**

Neighbourhoods	Number of Ovine-Owning Households
Guven	10
Kale	10
Cumhuriyet	0
<b>Total</b>	<b>20</b>

Source: SRM Field Study, 2019 based on the data obtained from the District Directorate of Agriculture. The District Directorate has the current list of ovine breeders in Kiyikoy.

Typical costs associated with ovine keeping is provided in Table 3-7.

**Table 3-8: Ovine Feed Costs**

Ovine (per Sheep/Goat)	Value
Daily feed amount (kg)	0.75
Cost of feed (kg/TL)	1.5
Feed consumed in 90 days per ovine (kg)	67.5
Feed expenditure for 90 days (TL)	101.25

Source: Veterinarian Senior Development Expert.

The information regarding grazing in the forestry areas of the settlements affected by the Project was obtained from Vize and Kiyikoy Directorates of Forestry. According to this; there is no grazing prohibition for bovine and ovine animals in the forest areas. The size of Kiyikoy's forest area is 83,680 decares providing ample land for grazing when compared to the current 429 decares of registered pasture area in the village. Availability of forest land for grazing, decreases pressure on limited pastureland due to Project's land acquisition.

The area of the affected pasture parcel area is limited when compared to the total area of the pastures registered in Kiyikoy town. In addition, the field surveys revealed that the PAPs prefer to utilize forest land for grazing. During the construction phase, the remaining area of the affected pasture parcel, which is 33.2 decare, will still be available for the grazing activities of the local people. The improvement of the remaining part (33.2 decare) of the pasture parcel no. 391/1 would considerably mitigate the economic impacts on the PAPs using this parcel for grazing purposes.

During the operation phase, the Project will not restrict access to grazing areas within the forest land in Kiyikoy and Kislacik, as there will be no fencing around the License Area of the Project units except the existing substation site. Thus, no Project-related impact is anticipated on the local people engaged in animal husbandry.

#### **3.3.4. Impacts on Vulnerable Persons**

There is one disabled vulnerable person identified within the License Area. He is living in the house located in the north of T15. The house he is residing in is owned by another PAP, who is living in Kislacik. This vulnerable PAP is on Government aid and also receives disability aid. The legal owner of the building allows the vulnerable PAP to stay without paying any rent as he does not have sufficient income.

The house will not be affected directly from the Project-related land acquisition. On the other hand, the construction related effects including dust emissions and noise generation might temporarily affect this receptor during the period of construction activities to be conducted at the location of T15. Upon completion of the construction works at this location, construction related impacts will cease.

During the operation phase, the operation phase impacts/risks including operational noise, shadow/flicker and blade/ice throw will need to be managed to avoid any adverse impact on this vulnerable PAP. The disabled vulnerable person residing in the house located in the north of T15, will be monitored and consulted for the mitigation of operation related impacts.



## 4. INSTITUTIONAL AND LEGAL FRAMEWORK

### 4.1. Institutional Framework

Administrative structure in Turkey consists of central and local administrations. The country is divided into provinces and the provinces are divided into further smaller divisions namely, districts, municipalities, towns, villages/neighbourhoods. This division is mainly based on geographic and economic conditions and need of public services. Each province, municipality, village/neighbourhood are administered by the local units of the government. Hence, at the local level, municipality mayors and headmen of neighbourhoods/villages (mukhtar) are the representatives of the administrative structure.

Ministries, headquartered in Ankara, serve as the core bodies of the central administration. Local branches of the ministries include provincial organisations connected to governors and district organisations connected to district governors.

The key central administration for the Project is the Ministry of Energy and Natural Resources (MoENR). The Energy Market Regulatory Authority (EMRA), which is amongst the related institutions of the MoENR, issues the Electricity Generation License for power plant projects, including the Kiyikoy WPP. EMRA is responsible for the issuance of Public Benefit Decisions and execution of expropriation (regular and accelerated) processes for the wind power plant investments in line with the applicable provisions of the Expropriation Law (Law No. 2942). For the Kiyikoy WPP Capacity Extension Project, the Public Benefit Decision (Decision No. 7837-14) was issued by EMRA on May 10, 2018.

The Ministry of Environment and Urbanization (MoEU) is the key organisation responsible from the development and implementation of policies and procedures for the protection and conservation of the environment and for sustainable development and management of natural resources. The MoEU (General Directorate of National Estate) is responsible for execution of the expropriation works based on the Public Benefit Decision issued by EMRA.

The Ministry of Agriculture and Forestry is responsible from the permitting process related to the use of pastures for industrial purposes.

### 4.2. National Legislation

Article 46 of Turkish Constitution addresses expropriation issues under the heading of "Social and Economic Rights and Responsibilities". The article states that whenever a development project serves public interest, the government is authorised to initiate and execute an expropriation process. All power (e.g. wind power), infrastructure (e.g. motorway, airport), and similar large-scale infrastructure projects are considered to be in public interest and provide the basis for Article 46. The Article refers to the relevant laws, including Expropriation Law (No. 2942).

The Expropriation Law (No. 2942) sets out the procedures for expropriation of immovable property in possession of natural and private legal entities by the State and public legal entities in circumstances where public interest requires, as well as procedures and methods for calculation of the expropriation price, registration of the immovable property and the right of way in the name of the authority, and settlement of related disputes. While expropriation is compulsory, the expropriation price must be paid prior to land entry by law. Moreover, the owner and occupant of the immovable property subject to expropriation and other concerned parties may file actions against the expropriation procedure or appraised values and errors of fact before judicial courts.

Article 27 of the Expropriation Law, states that; the immovable property subject to expropriation may be seized through accelerated expropriation under three circumstances; (i) in situations for which President takes decision regarding the need for national defense in the scope of the implementation of the Law on National Defense Obligations (Law No: 3634); (ii) in situations of emergency determined by the Presidential decision, or (iii) in extraordinary situations as envisaged by special laws. In such cases/situations, upon the request of the relevant administration, a court may decide on the seizure of the immovable property under the principles set forth in Article 10 on condition that the procedures other than valuation shall be completed afterwards. In this process,

upon request of the related administration, compensation amount for the immovable property shall be appraised by the court within 7 days through the experts assigned as per Article 10 and 15 of the Expropriation Law. Seizure shall only be made following the invitation to be done in accordance with Article 10 and the amount is deposited to the bank specified in the announcement. The related Directorate of Land Registry is notified about the seizure decision to be made by the Court. The provision related to the prohibition of the transfer or alienation of the immovable asset is annotated to the land register. The asset is evacuated as per Article 20 following the issuance seizure decision. The application of this process does not prevent challenges of the property owners against the determined expropriation fee.

Supplementary to the Expropriation Law, the following laws regulating the aspects related to the land acquisition would be applicable to the Kiyikoy WPP Capacity Extension Project:

- Cadastral Law (No. 3402)
- Forest Law (No. 6831)
- Land Registry Law (No. 2644)
- Pasture Law (No. 4342)
- Resettlement Law (No. 5543)

Land Registry Law (No. 2644) is the main land title regulation. Land registration in Turkey is based on the Cadastral Law (No. 3402). The Cadastral Law also defines the process for the identification of landowners without registered title deeds or where there is confusion over land ownership.

The use of state-owned lands (pastureland, forestry land, treasury land) by citizens is rule-bound. Citizens can rent pastureland after receiving the required permissions from the relevant Pastureland Commission which is a sub-unit of the Ministry of Agriculture and Forestry. Citizens can also rent treasury lands for agricultural, commercial, sports and social activities. Allocation of pastures to the investment projects is subject to the provisions of Pasture Law (No. 4342).

The majority of the land affected by the Project is located in state-owned forest lands. Therefore, as per the national legislation, the Project is subject to the provisions of the Forestry Law (No. 6831). The Project has obtained the Preliminary Forestry Permit from the Ministry of Agriculture and Forestry, General Directorate of Forestry in April 2019 for 18 of the new turbines (except T15 and T31) and made application for T15 and T31<sup>7</sup>. The process for the Final Forestry Permit will be completed prior to start of construction as per the requirements of the Forestry Law. Registered forest lands located within the rest of the License Area will remain to be under the ownership and authority of the Ministry of Agriculture and Forestry in line with the Forestry Law (No. 6831) and any activity to be conducted on these lands (e.g. logging) will be subject to the permit of the Ministry.

For the use of state-owned pasture parcels for the construction of Capacity Extension Project units, permit for the use of pasture lands (change of allocation purpose) is taken from the Ministry of Agriculture and Forestry (Provincial Directorate) as per the Pasture Law (No. 4342).

Registration of the ownership or easement rights for the state-owned parcels allocated to the investment projects will be carried out in accordance with the Cadastral Law No. 3402, and Land Registry Code.

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<sup>7</sup> The Project Company initially considered 21 turbines, but the technological advancements have allowed the Company to build and operate this additional capacity with 20 turbines, each having a capacity of 3.6 MWm. Thus, the permitting process has been executed for 20 turbines.

#### **4.3. EBRD PR 5 on Land Acquisition, Involuntary Resettlement and Economic Displacement**

The requirements of EBRD PR 5 (2014) pertaining to economic displacement are summarised below:

- To avoid or when unavoidable, minimise project induced economic displacement, whenever feasible, by exploring alternative project designs. If displacement is unavoidable, an appropriate livelihood restoration action plan should be developed.
- To mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to land, physical assets or natural resources by ensuring that livelihood restoration activities are planned and implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- To improve or, at a minimum, restore the livelihoods, income earning capacity and standards of living of displaced persons, including those who have no legally recognisable rights or claims to the land (present in the project affected area at the time of the cut-off date), to pre-project levels and support them during the transition period.
- To compensate economically displaced persons who are without legally recognisable claims to land for lost assets (such as crops, irrigation infrastructure and other improvements made to the land) other than land, at full replacement cost<sup>8</sup>.
- To provide assistance that will offset any loss of a community's commonly held resources. This could take the form of initiatives that enhance the productivity of the remaining resources to which the community has access, in-kind or cash compensation for loss of access or provision of access to alternative sources of the lost resource.
- To make special provisions for assisting disadvantaged or vulnerable individuals or groups (present in the project affected area at the time of the cut-off date) that may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of livelihood assistance and related development benefits.
- To provide transitional support to economically displaced persons, as necessary, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels and standards of living.
- To establish a grievance mechanism to receive and address in a timely fashion specific concerns about displacement and livelihood restoration that are raised by displaced persons.

EBRD PR5 (2014) requires development and implementation of an LRP in the case of transactions involving economic displacement only. The LRP is required to establish the entitlements of affected persons and communities and ensure that these are provided in a transparent, consistent and equitable manner.

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<sup>8</sup> Full replacement cost includes; net income approach for land valuation, transactional costs, any additional costs associated with attorneyship of court cases, etc.

#### 4.4. Gap Analysis

Topic/Issue	EBRD Requirements	National Requirements	Gaps
Avoidance and Minimisation	The client will consider feasible alternative project designs to avoid or at least minimize physical and/or economic displacement, while balancing environmental, social, and economic costs and benefits	There is no provision regarding avoiding and minimisation of resettlement in Turkish Expropriation Law.	<p>Even though avoidance and minimisation are not provisioned in national requirements, the Project Company has avoided physical displacement by proper siting of the Capacity Extension Project unit.</p> <p>The Project Company has also minimised land acquisition and associated economic impacts on PAPs by utilising the existing roads and routes to the extent possible. The Project will also utilise the current substation and the ETL of the existing Kiyikoy WPP, the Capacity Extension Project's requirement for additional land acquisition for connection to the national grid has been avoided.</p> <p>The Company has also decided to eliminate one of the 21 turbines based on the findings of the optimisation studies. Thus, the Capacity Extension Project will be built and operated with 20 turbines.</p> <p>Thus, avoidance and minimization of land acquisition has been adopted in the Project.</p>
Compensation for Loss of Land	Economically displaced persons will be compensated for such loss at full replacement cost. Economically displaced persons who are without legally recognisable claims to land (iii) will be compensated for lost assets other than land (such as crops, irrigation infrastructure and other improvements made to the land), at full replacement cost. The client is not required to	<p>Turkish law provides cash compensation to persons with legal rights/claims recognized.</p> <p>Valuation of agricultural land depends on capitalization of annual net income calculated by taking market prices into account.</p> <p>Customary users' rights on public and private property are recognised only for Treasury land, and compensation is</p>	<p>Gap exists for compensation of displaced persons without legally recognizable claims to land such as tenants, squatters.</p> <p>There is no compensation for displaced people benefiting from pasture lands, or forest land.</p> <p>Compensation is given only for crops/trees on treasury land.</p>

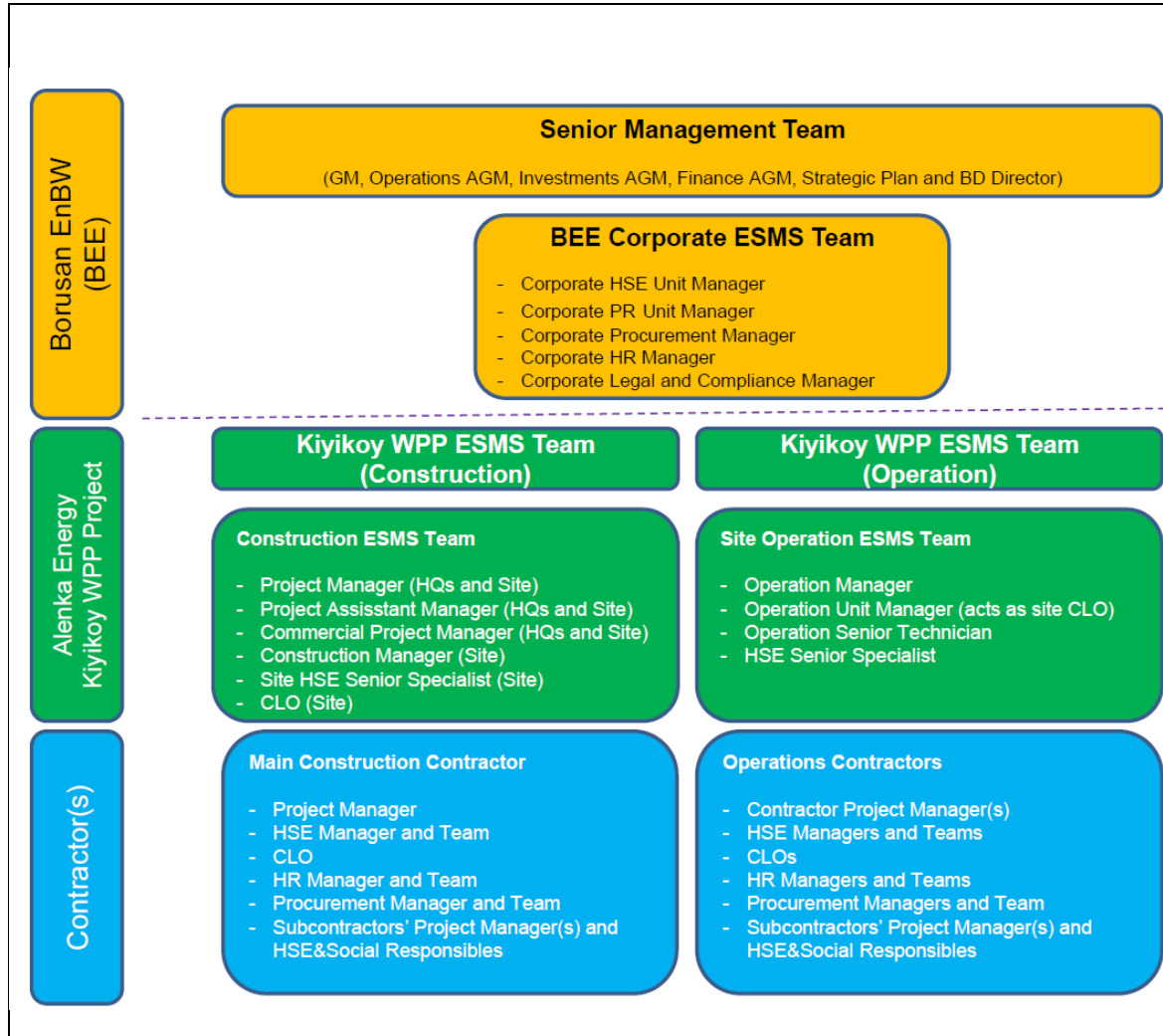
Topic/Issue	EBRD Requirements	National Requirements	Gaps
	compensate or assist opportunistic settlers who encroach on the project area after the cut-off date for eligibility.	provided for crops/trees and structures but not for land.	There is no livelihood restoration and/or transitional support provisioned in Turkish law except for government led resettlement.
Addressing Loss of Livelihoods	In addition to compensation for lost assets economically displaced persons whose livelihoods or income levels are adversely affected will also be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living	Expropriation law does not assess loss of livelihoods, compensation is provided to titleholders for land loss only.  There is no provisioning in the Turkish Law for livelihood restoration.  Government led resettlement has livelihood restoration components.	There is no provision of livelihood loss or assessment of individual livelihood impacts.  Pursuant to Turkish laws, only legal right owners can receive compensation.  Whereas, pursuant to international standards, all project- affected persons are granted the right of compensation which will enable them to restore their means of livelihood at least to the levels prior to the project
Compensation prior to land take/displacement	Displacement or restriction of access does not occur before necessary measures for resettlement are in place.	According to Expropriation law compensations need to be deposited into titleholders account prior to land take.	Accelerated expropriation and national Expropriation Law, is in line with EBRD standards in terms of provision of compensation prior to land take/displacement.
Measures for Vulnerable Persons	Livelihood planning should provide special assistance to women, minorities or vulnerable groups.	Expropriation Law does not specify vulnerable groups.  However, under the Turkish Constitution, the State guarantees his citizens to continue their lives in peace and security, also socio-economically encourage them to reach high standards of living.  In this context, the State applies several rules and measures to protect and to support its needy, weak, helpless and homeless citizens (ex. The Law No.2022 date 01.07.1976).	Land acquisition does not address vulnerability.

Topic/Issue	EBRD Requirements	National Requirements	Gaps
Monitoring and Evaluation	Monitoring and evaluation is required for projects that cannot avoid physical and economic displacement. Resettlement and livelihood restoration of the affected persons should be monitored for such projects.	No provisions for monitoring the implementation or impacts of expropriation or resettlement.	No provisions for monitoring the implementation or impacts of expropriation or resettlement.
Level and timing of Community Engagement / Consultation / Negotiation / Participation	EBRD emphasises early and meaningful consultations, preparation of a stakeholder engagement plan. Project should consult with project affected persons about the project's environmental and social aspects and should take their views into account.	Public participation meetings are conducted in accordance with the requirements of the national EIA Regulation as part of the EIA process. Expropriation process involves notification of the landowners about the process and valuation offers as well as negotiation of the offered prices.  There is no requirement for Stakeholder Engagement Plan.	There is no provision for effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them according to EBRD PR10. Consultations with communities are in later phases of the Project, either during EIA disclosure or formal land acquisition notification.
Project-level Grievance Redress Mechanisms	Where there are Affected Communities, the client will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance	In the expropriation process under national law, the owner's consent is not sought for the immovable property to be expropriated. Expropriation involves compulsory appropriation of the immovable property by the State for public interest. However, Expropriation Law (No. 2942) allows that the owner and occupant of the immovable property subject to expropriation and other concerned parties may file actions against the expropriation procedure or appraised values and errors of fact before judicial courts.	There was no Project-specific grievance mechanism. The Project-specific grievance mechanism has been developed as part of SEP for implementation during the construction and operation phases of the Project

Topic/Issue	EBRD Requirements	National Requirements	Gaps
		<p>Reference can also be made to the Law on the Use of the Right to Petition no 3071 and Law on the Right to Information No 4982</p> <p>Right to Information No 4982 states "Institutions are required to apply administrative and technical measures to provide every kind of information and document, with the exceptions set out in this law, to provide the information for applicants; and to review and decide on the applications for access to information promptly, effectively and correctly."</p>	

## 5. ROLES AND RESPONSIBILITIES

The ESMS Team of the Project will be responsible from implementation and supervision of this LRP. The planned organisational structure of the ESMS Team, including the Senior Management and the Project level ESMS roles of the Company and the contractors, is presented for the construction and operation phases in Figure 5-1. The roles and responsibilities of the ESMS Team in terms of implementation of this LRP are provided in Table 5-1.



**Figure 5-1. Kiyikoy WPP Project ESMS Team**

At the corporate level, BEE has a Social Monitoring Committee, including monitoring of land acquisition related processes, composed of following BEE personnel;

- BEE Investments Assistant General Manager
- BEE Operations Assistant General Manager
- Relevant Project Manager/Operation Manager
- BEE PR Unit Manager
- BEE Management Systems Manager (in case of grievances/comments related to the environmental concerns dictated by ISO 14001)



**Table 5-1. Roles and Responsibilities of the Project ESMS Team related to Land Acquisition Implementation**

<b>ESMS Team Member Roles and Responsibilities</b>	
<b>Corporate Roles for Construction and Operation</b>	
Senior Management Team	<ul style="list-style-type: none"> <li>Commitment to LRP implementation by allocating adequate human and financial resources required for implementation</li> </ul>
Corporate PR Unit Manager	<ul style="list-style-type: none"> <li>Oversee compliance of land acquisition related implementations with the EBRD PR1, PR5 and PR10.</li> <li>Approve LRP updates and training documents on the implementation of the LRP.</li> <li>Ensure effective and periodic communication with the external stakeholders in the issues relevant to Project-related land acquisition.</li> <li>Ensure community grievances relevant to Project-related land acquisition are collected, registered and responded by the Project Company as well as contractors and subcontractors as per the Project SEP.</li> <li>Keep the database of land acquisition related public grievances.</li> <li>In coordination with the contractors and subcontractors as required, develop and implement additional measures for resolving land access/acquisition related issues, including measures aimed at resolving non-closed grievances.</li> <li>Review budgetary limits and develop Project-specific strategies in coordination with the Project Manager/Operation Manager.</li> <li>Ensure coordination and consistency across all stakeholder facing activities by all parties, including local people affected by Project-related land acquisition.</li> </ul>
Corporate Procurement Manager	<ul style="list-style-type: none"> <li>Ensure engagement with stakeholders in line with Project SEP regarding Project's procurement requirements by taking the Project-related economic impacts on PAPs into consideration.</li> </ul>
SMC Committee	<ul style="list-style-type: none"> <li>Meets on ad hoc basis based on the need.</li> <li>Evaluate all submitted grievances/comments in terms of cost/benefit, monetary requirement, doability, and strategy.</li> <li>Report the results of the meeting to General Manager.</li> </ul>
<b>Construction Phase</b>	
Project Manager/ Project Assistant Manager/ Commercial Project Manager	<ul style="list-style-type: none"> <li>Ensure adequate resources are allocated for the implementation of the LRP during the construction phase.</li> <li>Full ownership of the implementation of LRP.</li> <li>Ensure contractors and subcontractors are fully aligned with the LRP, as required by the Project Company.</li> <li>Ensure maximisation of the local employment and procurement to the extent possible, by taking into consideration the PAPs defined in this LRP who would be subject to the impacts of Project-related land acquisition.</li> <li>Periodic reporting to the Company Senior Management on LRP implementation.</li> <li>Sending the grievance/requests including the land-acquisition related grievances (to the PR Unit Manager) that are to be submitted to the SMC in 3 working days before the SMC meeting.</li> </ul>
Construction Site Manager	<ul style="list-style-type: none"> <li>Coordinate and oversee the implementation of LRP by the contractor and subcontractor teams, as required by the Project Company.</li> <li>Report to the Project Management regarding the land acquisition related grievances received from the communities and their management in line with SEP.</li> <li>Support Site HSE Senior Specialist and the Site Community Liaison Officer (CLO) in the management of land acquisition related grievances by planning and implementing technical and administrative measures as required.</li> </ul>

ESMS Team Member	Roles and Responsibilities
Site HSE Senior Specialist	<ul style="list-style-type: none"> <li>Ensure LRP implementation and management of grievances in line with EBRD PR1, PR5 and PR10.</li> <li>Conduct internal HSE reporting including LRP implementation, for the Corporate ESMS managers and the Senior Management Team.</li> <li>Ensure trainings on LRP are provided to the team members responsible from the implementation of the LRP, through review of training records and related training documents.</li> </ul>
CLO (Site)	<ul style="list-style-type: none"> <li>Act as the Project Social Officer as per corporate procedures</li> <li>Ensure effective and periodic communication with the external stakeholders during the construction phase on subject including land acquisition.</li> <li>Ensure land acquisition related grievances are registered and responded as per the Project SEP.</li> </ul>
Main Construction Contractor and Sub-contractors (Project Managers and ESMS Teams including HSE/HR/Procurement Managers and Teams)	<ul style="list-style-type: none"> <li>Ensure compliance with the LRP through contractual requirements, as required.</li> <li>Ensure competent and trained staff is allocated to implement LRP.</li> <li>Ensure adequate resources are allocated for the implementation of the LRP.</li> <li>Ensure grievances are recorded and responded to appropriately and shared with the Project Company CLO</li> <li>Prepare periodic reports (Main Contractor to submit to the Project Company) including LRP implementation, as required by the Company.</li> </ul>
<b>Operation Phase</b>	
Operation Manager	<ul style="list-style-type: none"> <li>Ensure adequate resources are allocated for the implementation of the LRP during the operation phase in line with its Implementation Time Frame.</li> <li>Full ownership of the implementation of LRP, SEP and Project grievance mechanism.</li> <li>Periodic reporting to the Company Senior Management on SEP implementation.</li> <li>Sending the grievance/requests (to the PR Unit Manager) that are to be submitted to the SMC in 3 working days before the SMC meeting.</li> </ul>
Operation Unit Manager	<ul style="list-style-type: none"> <li>Act as the CLO (Project Social Officer as per corporate procedures) during the operation phase and ensure effective and periodic communication with the external stakeholders.</li> <li>Coordinate and oversee the implementation of SEP by the operation team.</li> <li>Report to the Project Management regarding the grievances received from the communities and their management in line with SEP.</li> <li>Support Site HSE Senior Specialist and the Site CLO in the management of internal and external grievances by planning and implementing operational and administrative measures as required.</li> <li>Ensure community grievances are registered and responded as per the Project SEP during the operation phase.</li> <li>Support HSE Senior Specialist in the management of internal grievances of the operation workforce as required.</li> </ul>
HSE Senior Specialist	<ul style="list-style-type: none"> <li>Ensure SEP implementation and management of grievances in line with EBRD PR1, PR5 and PR10.</li> <li>Implement, review, update and monitor the SEP.</li> <li>Conduct internal HSE reporting including SEP and Project grievance mechanism implementation, for the Corporate ESMS managers and the Senior Management Team.</li> <li>Ensure trainings on SEP and Project grievance mechanism are conducted.</li> <li>Identify the training requirements of the operation workforce together with the HR Manager and ensure implementation of the training program as identified.</li> <li>Ensure internal grievances are registered, transmitted to the Corporate HSE and HR units and responded as per the Project SEP.</li> </ul>

ESMS Team Member	Roles and Responsibilities
Main Operations Contractor and Sub-contractors (Project Managers and ESMS Teams including HSE/HR/Procurement Managers and Teams)	<ul style="list-style-type: none"> <li>• Ensure compliance with the Project SEP through contractual requirements.</li> <li>• Ensure competent and trained HSE staff is allocated to implement SEP and Project grievance mechanism.</li> <li>• Ensure adequate resources are allocated for the implementation of the SEP and grievance mechanism.</li> <li>• Ensure grievances are recorded and responded to appropriately and shared with the Project Company CLO</li> <li>• Prepare periodic HSE reports (Main Contractor to submit to the Project Company) including SEP implementation and management of grievances.</li> </ul>

## 6. LIVELIHOOD RESTORATION AND COMPENSATION

For the Kiyikoy WPP Capacity Extension Project, a Public Benefit Decision (Decision No. 7837-14) was issued by EMRA on May 10, 2018. Based on this decision, the Project Company initially evaluated the expropriation alternative for the acquisition of privately-owned lands (executed by the state agency responsible from expropriation) as per the Turkish Expropriation Law (No. 2942). In expropriation, cash compensation is provided by the state at determined compensation value. On the other hand, the Project Company is committed to implement the Project in line with EBRD's E&S Policy and related PRs including PR 5 on Land Acquisition, Involuntary Resettlement and Economic Displacement. Thus, the Project Company aims to acquire the privately-owned parcels required for the Project through negotiated settlement, whenever this is achievable. The Company management has already initiated negotiations with the owners of the related parcels and conducted meetings with the available shareholders of the parcels since July 2019. The Project Company will make all the reasonable efforts to avoid expropriation and acquire the related parcels through negotiated settlement meeting the objectives of EBRD PR5.

### 6.1. Key Compensation and Assistance Principles

The key principles of compensation, resettlement and livelihood restoration that the Project Company has committed to implementing are as follows:

- The Project Company has minimised land acquisition and associated impacts on PAPs by utilising the existing roads and routes to the extent possible. The Project will also utilise the current substation and the ETL of the existing Kiyikoy WPP, the Capacity Extension Project's requirement for additional land acquisition for connection to the national grid has been avoided.
- The Project Company has avoided physical displacement<sup>9</sup> by siting the new turbines and access roads on parcels where there are no physical structures located.
- The Project Company will preferentially implement the willing-buyer willing-seller method for the acquisition of privately-owned parcels required for the Project. Expropriation will only be resorted only in the case that this method cannot be implemented (e.g. in cases where existing incomplete inheritance issues are not foreseen to be resolved within a reasonable time with decent effort).
- The Project Company has selected a turbine model that encloses all the electrical equipment inside the turbine. Hence, there is no requirement for fencing off the turbines<sup>10</sup>. Consequently, any access restrictions for PAPs' using the forest land within the License Area for forestry activities, animal grazing or mushroom collection have been avoided by design. Access to the construction sites and routes will be temporarily restricted to avoid potential health and safety risks (due to use of heavy vehicles, construction vehicles causing site traffic, earthworks, electrocution hazards due to cabling works, etc.) on local community members using the forest lands within the License Area. Where restrictions on land access lead to impacts that can be identified and quantified at the level of individual households, impacted households will be provided with options to choose which approach to livelihood restoration best suits their situation.
- Livelihoods of PAPs will be restored at pre-Project level or improved; and the Project will ensure that programs are in place to restore livelihoods.
- There is no illegal users of forestry or treasury lands identified during the social field surveys conducted as part of the ESIA Report. The Project Company would abide by EBRD PR5 for the compensation of any illegal users according to entitlement matrix, if required.
- The Project Company has identified the disadvantaged or vulnerable groups/persons affected by the Project as part of the social field surveys conducted during the ESIA process. The vulnerable PAP living approximately 200 m north of T15 will not be affected by Project-related land acquisition. This vulnerable person will be closely monitored and consulted throughout the construction and operation

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<sup>9</sup> There is one building used by a single vulnerable male PAP approximately 200 m north of T15. The building is located outside of the land acquisition border designated for T15. Consultations with this PAP revealed that he does not prefer to resettle. This PAP is included in vulnerable groups and will be closely monitored.

<sup>10</sup> Only, the existing substation site will be fenced off to avoid potential risks on the community and worker's occupational health and safety.

periods in order to avoid and/or mitigate potential impacts. The Project Company will take necessary actions to ensure that the objectives of EBRD PR5 are fully met and the vulnerable persons/groups are not disadvantaged in the livelihood restoration process, are fully informed, aware of their rights, and are able to benefit equally from the Project benefits.

## 6.2. Eligibility for Livelihood Restoration and Compensation

PAPs whose livelihoods are affected by the Project are eligible for the livelihood restoration and compensation measures to be provided as part of the LRP.

As summarised in the previous sections (see Section 3.3.2), Capacity Extension Project's land acquisition is predominantly on forest land. Private land acquisition comprises only 3 parcels (Parcel no. 129/27 and Parcel no. 129/31 located on the route of main access road in Kiyikoy and Parcel no. 101/206 located on the land acquisition zone of T15 in Kislacik). There is also a single pasture parcel in Kislacik (Parcel no. 319/1) that will be partially acquired for the Capacity Extension Project (T15). Eligibilities within the scope of this LRP are described below:

- Majority of land acquired by the Project belongs to Forestry (state-owned forest parcels with Parcel no. 325/1 in Kiyikoy and Parcel no. 101/246 in Kislacik correspond to the Project License Area) The Project Company has obtained the Preliminary Forestry Permit from the Ministry of Agriculture and Forestry, General Directorate of Forestry in April 2019 for 18 of the new turbines (except T15 and T31) and made application for T15 and T31. It will make the payments to the related Forestry authorities in line with the Forestry Law (No. 6831) in order to acquire the rights for the use of the state-owned forest land for the duration of the Project. Even though the Project's land take for the construction and operation of the new turbines and access roads is limited and there will be no access restriction within the License Area during the operation phase (except the existing substation site), the users of the affected forest parcels for forestry activities, mushroom collection, beekeeping are also included in the LRP. Accordingly, the LRP specifies the entitlements to communal forest users to ensure that PAPs are not adversely impacted by Project-related land acquisition.
- Willing buyer seller led negotiated acquisition will be the main land acquisition strategy preferred by the Project. All private parcels will be obtained by willing-buyer-seller method depending on the availability of shareholders, and consensus on offered compensation. There are some shareholders of Parcel 129/27 who died, and the inheritance process is in progress. In the case that new shareholders of this parcel cannot be reached, the Project will inevitably resort to expropriation.
- In case expropriation is unavoidable, the Project will identify any gap between the compensation to be provided by the government (as permitted by the government) and if there is any gap, compensate owners according to full replacement cost as defined in EBRD PR 5. Full replacement cost includes; net income approach for land valuation, transactional costs, and any additional costs associated with court cases. Expropriation compensations are not subject to income tax.
- There is only 1 PAP identified (one of the 6 shareholders of Parcel no. 129/31 in Kiyikoy) during field study who is residing in the Project affected settlements. Except for the parcel used by this single resident PAP (Parcel no. 129/31) in Kiyikoy, Parcel no. 129/27 in Kiyikoy and Parcel no. 101/206 in Kislacik are not being used (by their shareholders or other users) for any agricultural purposes.
- Pasture parcel (Parcel no. 319/1) to be acquired partially<sup>11</sup> by the Project in Kiyikoy is used communally for ovine breeding. Ovine breeders in Kiyikoy are also included within the scope of the LRP to assure that there is enough grazing grounds for livestock production and the Project's potential impacts on the livestock producers are mitigated.

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<sup>11</sup> Total area of the pasture parcel (Parcel No. 319/1) to be acquired is 45 da, of which 11.8 da will be acquired and 33.2 da will remain unaffected.

### 6.3. Cut-off date for Eligibility

Cut-off date is the date after which anyone who moves into the project area is no longer entitled to compensation and/or assistance.

The EIA Positive Decision (Decision No: 4763) for the 100 MWm/100 MWe Capacity Extension Project has been issued by the MoEU on 14 September 2017. The final EIA Report that was the basis for the EIA Positive Decision (Decision No: 4763) specified the locations of the Capacity Extension Turbines. The final EIA Report has been disclosed to public by the MoEU for 10 (calendar) days prior to issuance of the EIA Positive Decision. The MoEU has also announced to public that the Capacity Extension Project has been provided with an EIA Positive Decision.

As part of the ESIA studies, social team conducted socio-economic baseline surveys with PAPs and users of the pastureland in order to identify impacts and define eligibility on 6-9 May 2019. All PAPs were informed about the Project-related land acquisition.

For the acquisition of the privately-owned parcels that are required for the construction of the Capacity Extension Project units, EMRA issued the Public Benefit Decision on 10 May 2018, which specified the three privately-owned parcels (located on the route of main access road and T15 land acquisition zone) to be acquired for the Project. As per the Expropriation Law (No. 2942), Public Benefit Decision is disclosed at the neighbourhood/village headmen offices, where the immovables to be expropriated area located, for 15 days. Fixed assets built or trees planted on the immovables to be expropriated are not taken into consideration in the expropriation valuation process.

The Project Company has recently executed its right to apply for accelerated expropriation as per the Expropriation Law on 8 July 2019. As of September 2019, EMRA is in the process of evaluating this application.

Asset valuation was conducted by General Directorate of National Estate on 11 July 2019. In parallel to the asset valuation completed by the authorities, the Company has started negotiated with the shareholders of the privately-owned parcels to be acquired for the Project in Kiyikoy and Kislacik.

- The date of asset valuation (11 July 2019) by the General Directorate of National Estate is the cut-off date for the Project's entitlements for LRP for formal owners/users of the affected lands.
- The date of socio-economic surveys (6-9 May 2019) is the cut-off date for the Project's entitlements for LRP for all other potential users of the affected lands.

Persons found occupying the Project area after the cut-off date will not be eligible for Project compensation or other resettlement benefits. Similarly, fixed assets (such as built structures or crops) established after the cut-off date will not be compensated.

### 6.4. Entitlements Matrix

Entitlements matrix prepared as part of this LRP aims to address the types of losses/impact and define the entitlements pertaining to the Project components/phases.

The underlying principle of this LRP is to improve or, at minimum restore the affected livelihoods to pre-project standards. Entitlements are based on the type of loss/impact and where necessary PAPs' categories/characteristics. Entitlements that will be provided to PAPs as per this LRP are presented in [Table 6-1](#).

**Table 6-1. Entitlements Matrix for Livelihood Restoration (Compensation and/or Assistance)**

Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
<b>Privately-owned Land</b>			
Permanent Loss of Privately-owned Agricultural Land with no formal/informal users (Parcel no. 129/27 (located on main access road) in Kiyikoy)	-5 shareholders unknown (names of the shareholders not recognized by neither the residents nor the mukhtar; no identified users)	Land is compensated at full replacement cost or Replacement land of similar quality, size and location is provided	<p>Willing-buyer-seller land acquisition is the preferred method for acquiring land. Compensation for willing-buyer-seller negotiations will be at full replacement value. The Project will acquire the full parcel in case of negotiated settlement.</p> <p>If willing-buyer-seller negotiations fail, land will be acquired through expropriation (executed by the state agency responsible from expropriation) as per Turkish Expropriation Law (No. 2942). Valuation of asset is conducted according to net income approach. In this case, cash compensation is provided by the state at determined compensation value.</p> <p>In case of expropriation, any gap between full replacement cost and expropriation value to be determined (by the related state agency responsible from expropriation) will be identified and compensated by the Company.</p> <p>If the parcel is to be expropriated, only the required portion of the parcel (44%) will be acquired for the Capacity Extension Project. Willing buyer seller negotiations will compensate for the entire parcel. Division of parcel is not allowed under negotiated agreements per national legislation.</p>
Permanent Loss of Privately-owned Agricultural Land	<p>Shareholders (6) of Parcel no. 129/31 located on main access road in Kiyikoy). The parcel is used by a single PAP for grazing:</p> <p>-1 shareholder living in Kiyikoy and using the land for grazing</p>	Land is compensated at full replacement cost or Replacement land of similar quality, size and location is provided	<p>Willing-buyer-seller land acquisition is the preferred method for acquiring land. Compensation for willing-buyer-seller negotiations will be at full replacement value. The Project will acquire the full parcel in case of negotiated settlement.</p> <p>If willing-buyer-seller negotiations fail, land will be acquired through expropriation (executed by the state agency responsible from expropriation) as per Turkish Expropriation Law (No. 2942).</p>



Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
	<p>(The land acquired by the Project is not cultivated, yet the grass is used by the shareholder/shareholder's son for grazing purposes (as animal feed). The PAP has 5 bovine animals, but the main source of income is forestry activities. The son of the parcel's shareholder also said that he has another 5-10 decares of inherited land from his parents. He requests the full parcel to be acquired)</p> <p>-5 shareholders unknown (names of the shareholders not recognized by neither the residents nor the mukhtar)</p>		<p>Valuation of asset is conducted according to net income approach. In this case, cash compensation is provided by the state at determined compensation value.</p> <p>In case of expropriation, any gap between full replacement cost and expropriation value to be determined (by the related state agency responsible from expropriation) will be identified and compensated by the Company.</p> <p>In case of expropriation, majority of the parcel (90.7%) will be acquired for the Capacity Extension Project. For the cases when the remaining portion becomes economically unviable, Article 12 of Turkish Expropriation Law (No. 2942) allows for the expropriation of the remaining portion by the state agency responsible from expropriation based on written application of the land owner (application must be done within the timeframes defined in the Expropriation Law). The Project Company will assist the shareholder(s) of the parcel in making the necessary applications to the related agencies for the compensation of orphan land.</p>
Permanent Loss of Privately-owned Agricultural Land	Owner of Parcel no. 101/206 located on the land acquisition zone of T15 in Kislacik). The parcel has no current formal/informal users. The owner is living in Vize district centre	Land is compensated at full replacement cost or Replacement land of similar quality, size and location is provided	<p>Willing-buyer-seller land acquisition is the preferred method for acquiring land. Compensation for willing-buyer-seller negotiations will be at full replacement value. The Project will acquire the full parcel in case of negotiated settlement.</p> <p>If willing-buyer-seller negotiations fail, land will be acquired through expropriation (executed by the state agency responsible from expropriation) as per Turkish Expropriation Law (No. 2942). Valuation of asset is conducted according to net income approach. In this case, cash compensation is provided by the state at determined compensation value.</p> <p>In case of expropriation, any gap between full replacement cost and expropriation value to be determined (by the related state agency</p>



Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
			responsible from expropriation) will be identified and compensated by the Company.  In case of expropriation, only the required portion of the parcel (46.9%) will be acquired for the Capacity Extension Project.
Loss of income and/or sources of livelihood associated with Project-related land acquisition	1 of the 6 shareholders of Parcel no. 129/31 located on main access road in Kiyikoy). The parcel is used by a single PAP for grazing. (The land acquired by the Project is not cultivated, yet the grass is used by the shareholder/shareholder's son for grazing purposes (as animal feed). The PAP has 5 bovine animals, but the main source of income is forestry activities. The son of the parcel's shareholder also said that he has another 5-10 decares of inherited land from his parents. He requests the full parcel to be acquired)	The client will offer all displaced persons and communities assistance to improve or at minimum restore their livelihoods to pre-project levels and support them during the transition period.	The PAP will be provided with opportunities to benefit from the animal husbandry supports provided by the Project.
Impacts on vulnerable groups/persons	1 PAP  (A disabled vulnerable person living in the house located in the north of T15 with the consent of the owner and receiving Government aid)	The client will take into account any vulnerable persons/groups and ensure that they benefit from resettlement opportunities and benefits	While the Project does not cause economic displacement and physical resettlement for this PAP, during operation phase the PAP may be occasionally affected by operational noise, shadow/flicker and blade/ice throw risk.  Project will ensure this PAPs' living standards are improved with improvements in his housing and regular cleaning services to be arranged and provided by the Project Company.

Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
			<p>The vulnerable PAP living in the north of T15 will be closely monitored throughout the construction and operation phases. Project-specific Stakeholder Engagement Plan will be implemented to regularly consult with him and address any relevant grievance and plan/take corrective actions in line with the Grievance Mechanism, where necessary.</p> <p>Noise monitoring will be conducted to verify compliance with Project standards and in case of receipt of noise-related grievances. In case of exceedance of Project standards at N-01, the Project Company will consult with the legal owner and user of the building in order to develop and implement actions for the management of noise impact with a mutually agreed method that will be approved by the Lenders.</p> <p>In consultation with the legal owner and the user of T15, insulation will be provided for the building if required.</p>
Loss of/damages to crops/trees or infrastructure due to Project's construction activities	PAPs in the Project impact area	Damages to crops/trees/infrastructure will be compensated at full replacement value/market value.	Project will pay in cash for damages (if there is any) to crops/trees or existing infrastructure at full replacement value.
<b>State-owned Forest Land</b>			
Restricted access to the forest land within the License Area temporarily during the construction phase	Forest users	The Client will provide assistance that will off-set any loss of a community's commonly held resources. This could take the form of initiatives that enhance the productivity of the remaining resources to which the community has access, in-kind or cash compensation for loss of access or provision of access to	<p>The mukhtars, members of Kiyikoy and Kislacik Development Cooperatives, forest users, and livestock producers will be regularly informed about the construction schedule and sites that will be restricted during the construction period for health and safety purposes.</p> <p>The Project Company will implement the SEP and consult with the forestry authorities and the forestry cooperative to mitigate potential impacts on the livelihoods of the forest users and maximise the benefits they can gain from the opportunities that will emerge as a result of Project's construction.</p>

Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
		alternative sources of the lost resource	
Loss of limited part of forest land	Forest users/ forest workers/ Development Cooperatives	The Client will provide assistance that will off-set any loss of a community's commonly held resources. This could take the form of initiatives that enhance the productivity of the remaining resources to which the community has access, in-kind or cash compensation for loss of access or provision of access to alternative sources of the lost resource	<p>The forest area to be acquired for the construction of Capacity Extension units is very limited when compared to the ample forest land available in Kiyikoy town and Kislacik village. As the License Area or the Project units except the existing substation site will not be fenced, the Project will not cause any restriction to access to the forest land.</p> <p>The Project Company will improve the existing forest roads. The effective width of the internal site access roads will be 6 m (which increases to 7.7 m when the drainage and cable channels are included). Upper layer of the internal site access roads will be paved with plant mix material. Thus, the Project will improve the accessibility of the users of the forests within the License Area, who are allowed to conduct their activities as permitted by the forestry authorities.</p> <p>The Project Company will consult with the forestry authorities and the Development Cooperatives to mitigate potential impacts on the livelihoods of the forest users and maximise the benefits they can gain from the opportunities that will emerge as a result of Project's construction.</p>
Loss of limited part of forest land	Mushroom gatherer women of Kislacik village	The Client will provide assistance that will off-set any loss of a community's commonly held resources. This could take the form of initiatives that enhance the productivity of the remaining resources to which the community has access, in-kind or cash compensation for loss of access or provision of access to	<p>The Project SEP including the grievance mechanism will be implemented.</p> <p>Construction schedule and sites will be shared with the women mushroom collectors in Kislacik in advance of the start of activities.</p> <p>The Project Company will consider mushroom collectors as part of the Project-specific CSR Plan to be developed and implemented.</p>

Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
		alternative sources of the lost resource	
Loss of limited part of forest land	Beekeepers within the Project Area	Compensation at replacement value in case of an income loss or damage to hives Support to beekeeping activities or Alternative income earning opportunities.	<p>Beekeeping is practiced in Kiyikoy and Kislacik. Field surveys conducted as part of the ESIA identified that there is no beekeeping activity conducted within Project's License Area. Nevertheless, there are beehives identified outside the License Area, around 1.7 km south of T34, adjacent to an existing forest road in the vicinity of the Turk Stream project site.</p> <p>The Project SEP including the grievance mechanism will be implemented to inform the beekeepers about the Project schedule, activities and units and collect their relevant concerns and suggestions for being consideration in the Project planning.</p> <p>Prior to start of construction phase, the Project Company will collaborate with the mukhtars, related authorities and agencies in order to inform the local beekeepers will be notified about the construction areas and schedule.</p> <p>During the construction period, if beehives are identified in the vicinity of the construction areas and in case required, the beehive owners will be contacted to provide for the relocation of beehives.</p> <p>If any Project related damage to beehives is identified (through the mukhtars and related local authorities where necessary), compensation at replacement cost will be paid to the beekeepers.</p>
<b>Pasture Land</b>			
Loss of grazing area	Livestock producers	The Client will provide assistance that will off-set any loss of a community's commonly held resources. This could take the form of initiatives that enhance the productivity of the remaining resources(pastures) to which the community has access, in-kind or	The remaining part of the pasture parcel 319/1 (in Kiyikoy) will be improved to mitigate adverse economic impacts on the households involved in animal husbandry. Project Company will collaborate with the Provincial Directorate of Agriculture and Forestry in order to identify and implement potential feasible pasture improvement measures which will be subject to final approval of the Pasture Commission established under the Provincial Directorate.

Type of Loss/Impact	Definition of PAPs/ Number of HH	EBRD PR5 Requirement	LRP Entitlements
		cash compensation for loss of access or provision of access to alternative sources of the lost resource	<p>The ovine and bovine breeders will be informed about the construction activities.</p> <p>PAPs who breed ovine (as identified by the related District Directorate of Agriculture) in Kiyikoy and use the affected pasture land (Parcel 319/1) for generating part of their income from ovine breeding will be provided with animal husbandry support (one-time) for the period of the construction activities that temporarily restrict the use of Parcel 319/1 (support will be for maximum 10 ovine per PAP) . The Project Company will not put any restriction on the use of the acquired pasture parcel during the operation phase.</p>

## 7. IMPLEMENTATION TIME FRAME

Implementation of LRP will start with Lenders' approval of the LRP and continue until the end of second year of the operation of the Capacity Extension Project.

After the completion of the second operational year, the Project Company will continue implementing the Project-specific CSR Plan.

A completion audit will be conducted by independent experts to be commissioned by the Project Company at the end of LRP implementation (end of second year of the operation of the Capacity Extension Project).

## 8. STAKEHOLDER CONSULTATIONS AND DISCLOSURE OF INFORMATION

### 8.1. Stakeholder Engagement in the Pre-ESIA Process

The Kiyikoy WPP is in operation since August 2014. The Project is well known in the region and engagement with the stakeholders have been conducted conventionally by the operations team until the involvement of the Project Company. The current operations team include 8 personnel from Kiyikoy town, who have acted as a bridge in conveying Project information to the local people residing in Kiyikoy.

The stakeholder engagement activities specific to the Capacity Extension Project have started at the time of the national EIA process. In this context, the formal stakeholder engagement (public participation) meeting, a requirement of the Turkish EIA Regulation, was held on December 4th, 2015 at the Kiyikoy Municipality as part of the scoping stage of the national EIA process. The meeting was announced in the local newspapers per the regulatory requirements. The meeting comprised of presentation of the Project details such as construction and operation activities, recording of comments and suggestions and distribution of handouts with Project information to the attendees. The EIA Review and Evaluation Commission set up by the MoEU, General Directorate of EIA, Permit and Inspection at the scoping stage of the national EIA processes included thirteen governmental stakeholders comprising the following authorities who also had responsibilities for Project-related land acquisition and/or permitting processes:

- Ministry of Food, Agriculture and Livestock (current Ministry of Agriculture and Forestry), Kırklareli Provincial Directorate
- General Directorate of Forestry

Based on the EIA Report prepared for the Capacity Extension Project, the MoEU granted an “EIA Positive Decision” on 14 September 2017 (Decision No: 4763) to the Kiyikoy WPP Capacity Extension Project.

BEE completed acquisition of the Kiyikoy WPP from its previous owner on 1 December 2017. Prior to acquisition, the senior management of the Company initiated preliminary stakeholder consultations on 30 October 2017 with the meeting held with the President of Kiyikoy Culture and Tourism Association. Following the field consultations, on 1 November 2017, a follow-up meeting was held with the President of Kiyikoy Culture and Tourism Association at the BEE Headquarters (HQs) in Istanbul in order to exchange general information on the socio-economic profile of Kiyikoy town, livelihoods of local people and potential cumulative impacts in the region.

As part of the zoning process being conducted as per the relevant national legislation, official views of fifty-eight related governmental stakeholders were collected in 2017 and 2018, which comprised the following authorities who also had Project-related land acquisition processes:

The Project team continued engagement with the stakeholders through field interviews conducted on 3 January 2019. Two stakeholder interviews (one resident of Kislacik and one resident of Kiyikoy) were conducted in Kislacik and Kiyikoy. General information regarding the socio-economic conditions of the settlements and level of knowledge of local people on the Project and their Project-related concerns, comments, and expectations were discussed in the interviews. One employee interview was also conducted as an internal stakeholder engagement and information on the past and existing working conditions was obtained.

## 8.2. Stakeholder Engagement as part of the ESIA Process

Stakeholder engagement activities as part of the ESIA process were conducted through three separate field visits held by the senior social specialists of SRM ("social team") as summarised in Table 8.2-1. A scoping (reconnaissance) site visit was conducted by the social team on 18 April 2019 with the participation of the representatives from the Project Company and the ESIA team. Based on the outcomes of the preliminary desk-based research and the scoping site visit, the social study area for the Project was identified and further desk-based research was conducted to design the field study program. As summarised below, the field study program involved key informant meetings, interviews with the PAPs, focus group meetings and meetings with the local governmental and non-governmental stakeholders as well as internal stakeholders of the Project.

In addition to ESIA consultation, the Project Company initiated consultations with the households affected from the Project-related land acquisition.

**Table 8.2-1. Summary of the Stakeholder Engagement Activities Conducted**

Tasks	Date of the Field Study	Scope of the Field Study
Scoping study (as part of ESIA)	18 April 2019	<ul style="list-style-type: none"> <li>-Meeting with the existing site operations team and obtaining information on the Project background and current operations including social activities</li> <li>-Visiting the License Area, turbine locations, parcels to be affected by Project-related land acquisition, nearby structures and the main access road route</li> </ul>
Key stakeholder meetings	2-3 May 2019	<ul style="list-style-type: none"> <li>-Meetings with the public stakeholders at provincial level, district level and neighbourhood level</li> <li>-Preliminary face to face meetings with the mukhtars of five (5) settlement (three neighbourhoods in Kiyikoy town, and Kislacik and Hamidiye villages)</li> </ul>
In-depth interviews and focus group meetings	6-9 May 2019	<ul style="list-style-type: none"> <li>-In-depth interviews with the mukhtars (mukhtar surveys) of five (5) settlements (three neighbourhoods in Kiyikoy town, and Kislacik and Hamidiye villages)</li> <li>-Four (4) focus group discussions (including women meetings)</li> <li>-Four (4) in-depth interviews</li> <li>-Interviews with Vize Municipality, Vize District Directorate of Agriculture, Forest Sub-District Directorate of Kiyikoy, Provincial Directorate for Agriculture-Pasture Division; -</li> <li>-Interviews with other local business (representatives of the Turk Stream Project located partially within the southern part of the License Area)</li> <li>-Nine (9) NGOs</li> </ul>
LRP meetings	9 July 2019 25 July 2019 26 September 2019	<ul style="list-style-type: none"> <li>-Negotiations with the shareholders of the privately-owned parcels to be acquired for the Project in Kiyikoy and Kislacik</li> <li>-Consultations with the vulnerable PAP living in the north of T15</li> </ul>

The number of the meetings and stakeholder consulted as part of the field surveys is summarised in Table 8.2-2. The meetings and consultations have been designed to reach out the governmental authorities having responsibilities for the Project-related land acquisition process as well as the PAPs that are to be covered in this LRP.



**Table 8.2-2. Field Study Summary**

No	Consulted Stakeholders	Number of Institutions / Meetings	Number of Consulted Stakeholders
<b>A. Consultations with Governmental Organisations (Total)</b>		<b>12</b>	<b>14</b>
1	Kirklareli Governorate	1	1
2	Provincial Directorate of Environmental and Urbanization	1	1
3	Provincial Directorate of Agriculture	2	3
4	Vize Directorate of Forestry	2	4
5	Kiyikoy Sub-district Directorate of Forestry	1	1
6	Vize District Directorate of Agriculture	2	1
7	Vize Sub-governorate	1	1
8	Vize Municipality	1	1
9	Public Education Center	1	1
<b>B. Consultations with Non-governmental Organisations (NGOs)</b>		<b>9</b>	<b>11</b>
<b>C. Socio-economic Field Research (Total)</b>		<b>20</b>	<b>36</b>
1	Preliminary Face to Face Meetings with the Mukhtars	5	5
2	In-depth Interviews with the Mukhtars	5	5
3	In-depth interviews with the Community	4	4
4	Focus group discussions	4	19
5	Household surveys	1	1
6	Other Local Business	1	2
<b>Total</b>		<b>41</b>	<b>61</b>

Source: SRM Field Study, May 2019.

PAPs have stated the below concerns relevant to livelihoods during the field study consultations:

- How much forest area will be affected?
- Will new roads be built?
- Will a transmission line be constructed?
- Will there be local employment?
- Will local purchases be made?
- How will the project affect bees and honey yield?
- What will be the impacts on mushroom harvesting?
- Will animal transit roads and livestock activities be affected?
- How will pasture lands be affected?

These concerns are addressed in ESIA and are integrated into livelihood assistance options within LRP.

## 9. PUBLIC GRIEVANCE MECHANISM

The existing Kiyikoy WPP has adopted the Corporate Social Monitoring and Grievance Mechanism Procedure for the management of potential grievances/comments from the public. Based on the existing corporate documentation, the Project Company has developed a stand-alone Project SEP including the grievance mechanism for public, which will be implemented throughout the construction and operation phases of the Capacity Extension Project.

The Project Company will appoint a CLO (interchangeably named as Project Social Officer-PSO) who will have the following key responsibilities regarding implementation of the Project SEP and the grievance mechanism:

- Ensuring effective and periodic communication with the external stakeholders,
- Ensuring community grievances are registered and responded as per the Project SEP,
- Developing and implementing additional/corrective measures for resolving community related issues, including measures aimed at resolving non-closed grievances in coordination with the contractors and subcontractors as required,
- Ensuring coordination and consistency across all Project stakeholder.

The details of the public grievance mechanism are presented in the Project SEP. Through the public grievance mechanism, external stakeholders can initiate the grievance/comment mechanism by using the following methods:

- Grievance/comment boxes and forms<sup>12</sup> to be placed at public places including places commonly/comfortably visited by women) as well as Project substation site
- Verbally during face-to-face meetings/visits to be held by the Project personnel (e.g. site chiefs/managers, CLOs)
- Telephone (the contact numbers that can be used to submit grievances/comments to the CLO will be shared with the local communities in due course)
- E-mail (the e-mail address for the submittal of grievances/comments will be shared with the local communities in due course)
- Website (the contact number of the CLO will be shared with the local communities in due course)

The CLO will inform the stakeholder about the feedback of the Company for the grievance/comment through the grievance/comment close out form within maximum 30 days of receiving grievance/comment.

Grievances/comments submitted to other BEE/Project personnel verbally during face-to-face meetings or through telephone calls or e-mails will be transmitted by the receiver of the grievance/comment to the Site CLO (construction)/Operation Unit Manager (operation) for recording.

As necessary, land-acquisition related grievances will be shared with the governmental authorities responsible from the land acquisition process for the Project.

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<sup>12</sup> As per the Corporate Social Monitoring and Grievance Mechanism Procedure, BEE has in place the "Project Notification and Communication Opening Form" and "Project Notification and Communication Closing Form", is are specially designed to collect questions, complaints, requests and recommendations and give feedback to the questions, complaints, requests and recommendations. Project Notification and Communication Opening Form is referred to as grievance/comment form in this SEP.

Grievances/comments submitted through the website will be checked and coordinated by the Corporate PR Unit. They will also be transmitted to the Site CLO (construction)/Operation Unit Manager (operation) for site records.

Contractors/subcontractors will be responsible for providing their personnel with access to the grievance mechanism defined in this SEP, collect the grievances/comments accordingly, inform the Project Company site/operation managers and CLOs immediately upon receipt and take the actions for the management/resolution of the grievance with approval from the Project Company site/operation managers and in coordination with the CLOs.

## 10. MONITORING AND REPORTING

The Project Company will be responsible for the implementation of all aspects of the LRP. Parties involved in the different aspects of project implementation will be required to comply with the requirements set out in this LRP. Stakeholder consultations will be done as outlined in the Project SEP document.

The implementation of the LRP will start after Lender's approval of the document. Continuous internal monitoring, evaluation and periodic reporting on LRP implementation will be undertaken by the Project Company and will involve participation of key stakeholders including affected persons and other project stakeholders. The Social Monitoring Committee (SMC) of BEE reporting to General Manager will also monitor the LRP implementation periodically

External monitoring will be conducted by independent consultants as required by the Lenders.

A completion audit will be conducted by independent experts to be commissioned by the Project Company (subject to Lenders' approval) to evaluate the success of activities under the LRP. The completion audit will be undertaken at the end of second year of the operation of Capacity Extension Project to ensure compliance with livelihood restoration objectives and requirements. In the event that monitoring identifies non-conformance with EBRD PR5 objectives, these will be investigated, and appropriate corrective actions will be identified.

The key objectives of the completion audit will be as outlined below:

- To verify that all entitlements and commitments described in the Livelihoods Restoration Plan have been delivered;
- To determine whether the LRP measures have been effective in restoring or enhancing affected peoples' livelihoods;
- To check on any grievances that may have been left outstanding;
- To identify any corrective actions necessary to achieve completion of the Livelihood Restoration Plan commitments.

Monitoring of the Project against defined monitoring indicators will ensure effective implementation of the livelihood restoration and compensation measures set out in this LRP.

Proposed key monitoring indicators under LRPF are listed in [Table 10-1](#).

**Table 10-1. Key Monitoring Indicators**

Key Indicators	Source of information	Frequency	Responsible Party
<b>Input Indicators</b>			
Overall spending for livelihood activities	Financial records	Annual	Project Company
Number of PAPs	Census data	Quarterly	Project Company
Number of stakeholder meetings and consultations	SEP and data management	Monthly	Project Company
<b>Output Indicators</b>			
Number of people received compensation	Data management	Monthly	Project Company
Number of compensation agreements signed	Data management	Monthly	Project Company
Number of grievances related to land acquisition	Grievance Database	Monthly	Project Company
LRP activities provided	Data management	Monthly	Project Company

## 11. IMPLEMENTATION COSTS

The Project Company will allocate an adequate budget for the implementation of the LRP and inform the Lenders prior to start of construction about the allocated budget and the disbursement plan. The LRP budget will have separate items for the compensation and assistance to be provided for Land Acquisition, Livelihood Restoration and/or Assistance:

**Table 11-1. Budget for LRP Implementation**

Budget Item	Target PAPs/ Stakeholders	Action
<b>A. Land Acquisition</b>	Shareholders of the privately owned 3 parcels	Acquisition will be done through willing-buyer-seller as the preferred method. When acquisition through willing-buyer-seller method cannot be achieved, expropriation of parcels (one or more) will be resorted.  In case of expropriation, transaction costs will be paid by the Company and any gap between full replacement cost and expropriation value to be determined by the state will be identified and compensated by the Company.
	General Directorate of the Forestry	Acquisition of forest land through rental from the General Directorate of the Forestry will be done.  The fee for the use of forest land throughout the Project life will be determined by the General Directorate of Forestry and paid by the Company.
	Ministry of Agriculture and Forestry	Acquisition of pastureland from the Ministry of Agriculture.  The fee for the use of pastureland throughout the Project life will be determined by the Ministry of Agriculture.
<b>B. Livelihood Restoration Assistance</b>	Parcel no. 129/31 (1 of the 6 shareholders, who actively uses the parcel for grazing)	Husbandry supports will be provided during the construction phase as specified in the Entitlements Matrix.
	Forest users in Kiyikoy and Kislacik	Assistance will be provided to forest users in Kiyikoy and Kislacik in consultation with the Forestry authorities and Development Cooperatives to improve their livelihoods through opportunities with forestry activities during the construction phase to the extent permitted by the authorities.
	Users of Pasture parcel 319/1 in Kiyikoy	Husbandry supports will be provided during the construction phase as specified in the Entitlements Matrix.
<b>C. CSR*</b>	Relevant local and regional stakeholders including vulnerable persons/groups in Kiyikoy and Kislacik	Targeted projects will be developed as part of the Project specific CSR Plan.
	Mushroom collector women in Kislacik	Targeted projects will be developed as part of the Project specific CSR Plan.
	Vulnerable PAP living in the north of T15	Targeted projects will be developed as part of the Project specific CSR Plan.
<b>D. LRP Monitoring and Audit</b>	External monitoring framework to be agreed with the independent consultants and Lenders	
	Internal monitoring to be done by the Project Personnel HSE and PR team.	

Budget Item	Target PAPs/ Stakeholders	Action
		A completion audit will be conducted by independent experts to be commissioned by the Project Company at the end of LRP implementation (end of second year of the operation of the Capacity Extension Project).

*\*Additional support items may be developed for other focus area by the Project Company as part of the CSR Plan.*

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