

Environmental and Social Action Plan (ESAP) for Akfen Wind Portfolio

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, IFC PS Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
Management of Environmental, Social and Governance (ESG) issues							
All WPPs in General							
1.1	Implement Corporate ESAP fully in existing and new sites Provide an annual summary of implementation and ongoing information of any complaints or non-compliance events	Compliance with local legislation Need to ensure resources are provided for implementation	Lenders ESAP agreed as part of financing into Akfen Renewables in 2015	Akfen Renewable, with support from external consultants	ongoing	Summarize in annual report Ongoing follow-up per ESAP.	
1.2	Increase internal Environmental&Social (E&S) capacity with additional E&S staff with adequate qualifications, skills and experience. Appoint an Environment-Health-Safety (EHS) manager as well as a community liaison officer to management Corporate Social Responsibility (CSR) issues at all renewable project sites.	Increased monitoring of the project sites and contractors Ensure appropriate staff available to manage issues	Lenders	Akfen Renewable	2018	Updated EHS and Social Organisation chart Liaison officer to visit on regular basis local regulators and communities to ensure implementation of Stakeholder engagement Plan (SEP) and CSR Ongoing follow-up per ESAP.	

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1.3	Develop and Implement an EHS management system for each Project sites in line with corporate ESH management system and including the management of internal and external grievances.	Implement Environmental and Social Management System specific Environmental and Social Management Plans for the management of environmental and social risks Project.	PR 1/PS1	Akfen Renewable, with support from external consultants	During mobilization before construction by June 2018. The documents for the operation phase will be produced before commissioning.	Documentation for construction phase are prepared by June 2018. Documentation for operation phase are prepared before commissioning. Ongoing follow-up per ESAP.	

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1.4	<p>As part of Corporate Social Responsibility (CSR) program develop a CSR and community interaction action for each Project site. Fund should be provided for each site. An initial budget of 70 K USD for 2018, and then around 40 K USD per annum with a flexibility to distribute according to the needs of the local communities around the projects. Each site needs to receive some funding every 2-3 years.</p> <p>The CSR will include the development of local action plan and interaction with the local community and support for local development projects.</p> <p>Specifically include the local opportunities for the development of available beekeeping projects in CSR programme for Denizli.</p> <p>A summary of the CSR program will be made available locally in local press and web site.</p>	<p>The CSR program will aim to assist the local community to ensure there is a 'buy-in' into the project and there are some local benefits from the project.</p>	<p>Lenders requirement, best practice.</p>	<p>A minimum lump-sum contribution of USD 70 K distributed among all sites, during construction per site, and then an annual contribution of circa USD 40 K to be distributed on as needed basis, with a principal that every site receiving funding every 2 years.</p>	<p>Report to Lender and information published in local paper and on web site on the CSR program, what funds are used for and how they benefit the local community</p>	<p>2018 – onwards.</p> <p>Commitment provided prior to financial close with CSR program in place</p> <p>In annual report provide information on CSR programme and sum spent per site and total and priority programs</p> <p>Ongoing follow-up per ESAP.</p>	<p>The CSR program will be stand alone for the Project . The CSR program will link with the SEP to ensure a consistent approach and engagement with local community.</p>

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1.5	Develop and Implement Corporate Social Responsibility (CSR) plan and Stakeholder Engagement Plan (SEP) for each site. Update on annual basis. Provide information on CSR program implementation in annual report.	Positive communication with the surrounding communities and hence possible protection of the assets	Best practice	Akfen Renewable	ongoing	Report in Annual Report Ongoing follow-up per ESAP.	
1.6	Publish Non Technical Summary (NTS) for each project on Akfen web site and maintain information on each project on internet and in local community. Every 3 years undertake a review (internal audit) of implementation and need to update NTS	Update information as needed.	EBRD / Lenders Existing ESAP	Akfen Renewable	ongoing	NTS published Ongoing follow-up per ESAP.	

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1.7	The existing ecosystem evaluation reports to be updated in line with EBRD PR1/IFC PS1 and PR6/IFC PS6 for Project, including management strategy and mitigation measures for all phases in line with findings of additional baseline studies.	<p>Need to further review sites data, notably on biodiversity to help define the ESH management plans and mitigation actions.</p> <p>A well-defined area of influence and baseline data are essential to capture all potential impacts and changes related to the Project activities and to define the appropriate mitigation measures.</p> <p>An accurate description and delineation of the Project and biodiversity baseline data at an appropriate level of detail need to be established.</p>	PR 1 (PR6) PS1 (PS6)	Akfen Renewable, with support from external consultants after the baseline data collection.	<p>Start additional baseline data collection by April, 2018.</p> <p>The following Biodiversity Baseline Studies are completed by September 2018:</p> <p>Birds (October), Flora, Bats, Fauna</p>	<p>Completed Biodiversity Baseline studies by September 2018.</p> <p>Ongoing follow-up per ESAP.</p>	
Project Specific Üçpınar and Kocalar WPP							

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1.8	<p>The Project specific management plans and environmental, social and Occupational Health and Safety (OHS) monitoring plan should consider the cumulative impacts of these two Projects on Harmancık and Çamyayla Villages.</p> <p>The mitigation measures and operational constraints to be defined in relation to ornithological impacts should consider the operation of both projects.</p>	<p>Çamyayla and Harmancık Villages are in the Social Area of Influence of both the Kocalar and Üçpınar Projects. The SEPs should address this issue.</p>	PR1/PS1	Akfen Renewable, with support from external consultants	SEP to be updated by 30th of May, 2018.	<p>Updated SEP</p> <p>See item 6.1-2 for ornithological impact assessment.</p> <p>See item 1.3 for the development of project specific management plans and environmental, social and OHS monitoring plans</p> <p>Ongoing follow-up per ESAP.</p>	Ongoing
1.9	<p>The Project specific management plans and environmental, social and OHS monitoring plan should consider the cumulative impacts of these two Projects on Çınarlı Village and Çanakalan Village.</p> <p>The mitigation measures and operational constraints to be defined in relation to ornithological impacts should consider the operation of both Projects.</p>	<p>There is an existing Wind Farm at the northeast part of the Energy License Area of the Project, namely, the “İntepe Wind Power Plant”. The Çınarlı Village and the Çanakalan Village, which are very close to the İntepe WPP, are also in the Social Area of Influence of the Project. Therefore, it is possible that the residents in these villages may be affected cumulatively by the İntepe WPP and Hasanoba WPP. The stakeholder engagement plans should address this fact.</p>	PR1/PS1 PR6/PS6	Akfen Renewable, with support from external consultants	SEP to be updated by 30 th of May, 2018.	<p>Updated SEP.</p> <p>See item 6.1-2 for ornithological impact assessment.</p> <p>See item 1.3 for the development of project specific management plans and environmental, social and OHS monitoring plans</p> <p>Ongoing follow-up per ESAP.</p>	Ongoing

PR 3

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All WPPs in General							
3.1	Implement noise monitoring plan as part of project specific HSE Management Plan and develop and implement mitigation measures in case of non-compliance recorded as per the monitoring plan.	Implement Environmental and Social Management System specific Environmental and Social Management Plans for the management of environmental and social risks Project and prevention of pollution.	PR 3/PS 3	Akfen Renewable, with support from external consultants	During construction as per the monitoring plan During operation as per the monitoring plan	Development and implementation of monitoring plan Monitoring records See item 1.3 for the Project specific EHS Plan. Ongoing follow-up per ESAP.	
PR 5							
All WPPs in General							
5.1	Implementation of corporate Land acquisition policy and procedure	Land acquisition for all land required by the Project needs to be managed to ensure the minimization of impact on the Project Affected People (PAP) through the implementation of a structured policy, plan and procedures.	PR 5 PS5	Akfen Renewable,	June 2018 for project facilities	Records regarding Land acquisition policy and procedure in place Ongoing follow-up per ESAP.	

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5.2	Liaison with TEİAŞ for the land acquisition of the power lines.	Land acquisition for all land required by the Project needs to be managed to ensure the minimization of impact on the Project Affected People through the implementation of a structured policy, plan and procedures.	PR5 PS5	Akfen Renewable	Continuous through the land acquisition and construction of the power lines.	Ongoing follow-up per ESAP.	
5.3	<p>Perform external Audits for implementation of Land Acquisition policy and process;</p> <ol style="list-style-type: none"> 1. Records regarding Land acquisition policy and procedure in place 2. Liaison with TEİAŞ 	Land acquisition for all land required by the Project needs to be managed to ensure the minimization of impact on the Project Affected People through the implementation of a structured policy, plan and procedures.	PR5 PS5	Akfen Renewable, with support from external consultants	<p>July 2018 for the project facilities</p> <p>6 monthly for during the land acquisition and construction of the power lines.</p>	<p>Completion of Audits for implementation of Land Acquisition policy and process on;</p> <ol style="list-style-type: none"> 1. Records regarding Land acquisition policy and procedure in place 2. Liaison with TEİAŞ 	
5.4	<p>The consultation activities should be implemented, monitored and reported as per the revised SEP.</p> <p>The grievances and suggestions of stakeholders (including the PAPs along the powerlines) should be monitored and negotiations should be conducted in line with SEP.</p> <p>The SEP and internal/external grievance mechanism should be announced to the all stakeholders.</p>	Effective stakeholder engagement is required as a structured, traceable and documented approach.	PR 5 PS5	Akfen Renewable,	SEP in place by 30 th of May, 2018 to be updated as per the frequency stated in SEP.	<p>Implementation of SEP.</p> <p>Records, meeting notes, periodically report regarding SEP engagement activities</p> <p>Ongoing follow-up per ESAP.</p>	Initial engagement activities were performed

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PR6 Biodiversity and Living Natural Resources							
All WPPs in General							
6.1	Undertake additional baseline data collection studies to allow for appropriate data on bird and bats, flora and fauna to develop action plans for all sites.	Assessment of Biodiversity and Living Natural Resources needs to define a mitigation strategy for direct and indirect impacts of the Project biological components.	PR6 /PS6 BAT Assessment in line with EUROBAT Guidance, Bird assessment in line the Scottish Natural Heritage (SNH) and Birdlife International Reference documents /guidance.	Akfen Renewable, with support from external consultants after the baseline data collection.	Start additional baseline data collection by April 2018.	Completed baseline studies by October 2018 Ongoing follow-up per ESAP.	

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6.2	<p>Specific BAPs for the Project needs to be developed according to the Biodiversity Conservation Management and Action Plan which is prepared by Akfen.</p> <p>While developing BAP, above mentioned additional studies, defined mitigation measures should be taken into consideration.</p> <p>Preliminary findings to be sent for approval to Lenders by June 2018 as a condition precedence (CP) for disbursement of Loan.</p>	<p>Assessment of Biodiversity and Living Natural Resources needs to define a mitigation strategy for direct and indirect impacts of the Project biological components.</p>	<p>PR6 /PS6 BAT Assessment in lien with EUROBAT Guidance, Bird assessment in line the SNH and Birdlife International Reference documents /guidance.</p>	<p>External consultants</p>	<p>June 2018 with the preliminary findings of baseline surveys that could be completed by June, updated by end of 2018.</p>	<p>Preliminary Biodiversity Action Plan (BAP) Provide to Lenders as CP. Ongoing follow-up per ESAP.</p>	

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Project Specific Hasanoba WPP							
6.3	<p>For Hasanoba site developed Collision Risk Assessment (CRA) based on the Scottish National Heritage Model (SNH) are to be developed by end of 2018</p> <p>Based on above Operate an Active Turbine Management and a Shutdown system and operate the project to ensure operations do not result in population impacts or mortality that will result in incremental mortality that exceeds thresholds as defined in the CRA.</p>	<p>Assessment of Biodiversity and Living Natural Resources needs to define a mitigation strategy for direct and indirect impacts of the Project biological components.</p>	<p>PR6 PS6 Bird assessment in line the SNH and Birdlife International Reference documents /guidance.</p>	<p>Akfen Renewable, with support from external consultants after the baseline data collection.</p>	<p>Draft bird collision risk assessment by June 2018. Final bird collision risk assessment November 2018 Active turbine management system by November 2018</p>	<p>Draft bird collision risk assessment by June 2018. Final bird collision risk assessment November 2018 Active turbine management system by November 2018. Ongoing follow-up per ESAP.</p>	

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6.4	<p>The Company will appoint an independent ornithological expert (IOE) to provide independent expert advice on ornithological aspects of the Hasanoba Project. The IOE will be appointed by the Company on a 3 year basis. The expert will be employed full time (and have adequate experience). The IOE will be appointed by the Company on a non objection basis by the Lenders.</p> <p>The BAP to be part of the Actions monitoring and implemented by the IOE for Hasanoba.</p>	<p>The IOE will report on ornithological issues as required.</p>	<p>Lenders requirement</p>	<p>External consultants</p>	<p>2018 onwards</p>	<p>Independent IOE appointed by Akfen based on non-objection from Lenders. IOE re-appointed every 3 years.</p> <p>OIE to be member of Ornithological Society of Turkey or BirdLife</p> <p>Ongoing follow-up per ESAP.</p>	
6.5	<p>For Hasanoba Wind Farm due to more sensitive location, The Company will shut down wind turbines on the basis of written Notice to Close issued by the IOE, although due to the requirement to provide immediate shut down in the field the first point of command will be via telecommunication links [Information on these instances will be provided to the Lenders within 3 days.)</p> <p>Include in business plan 14 days shut down for wind turbines. Report on number of turbines and hours shut down in annual report to Lenders.</p>	<p>In order to reduce the risk of bird collisions, the wind farm will be shut down in the case of risk of bird collision. The IOE will provide written notice and keep a register of all such actions which will be immediately reported to the Lenders as well as local authorities. Summary of information will be published annually</p>	<p>PR6 /PS6</p>	<p>External expert IOE</p>	<p>Operational phase</p> <p>Review of 14 days estimate for closure with the first findings on bird monitoring in June.</p>	<p>Information on annual basis to Lenders on shut down actions and results</p> <p>Ongoing follow-up per ESAP.</p>	

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All WPPs in General Cultural Heritage							
8.1	Employees to be trained on what to do in case of chance finding any archaeological finding on Site.	Management cultural heritage risks includes the training of the employees on the chance find procures.	PR 8, PS 8, National Legislation	Akfen Renewable,	Akfen Renewable, with support from external consultants	Trainings delivered, training records. Ongoing follow-up per ESAP.	Not started
PR10 Information Disclosure and Stakeholder Engagement							
All WPPs in General							
10.1	<p>The Company will update by end of May the Sep to ensure appropriate stakeholder engagement for each of the wind farm sites in line with Corporate ESAP requirements.</p> <p>The SEP will be published for each site and include both external and internal grievance procedures in line with PR 10. SEPs for each site will include the management of internal and external grievances.</p>	Effective stakeholder engagement is required a structured, traceable and documented approach.	PR 10 PS 1	Akfen Renewable,	<p>Updated SEP sent to Lenders end of May 2018 and published on web Akfen Web sites in June 2018 in English and Turkish.</p> <p>Implementati on of SEP throughout the project life span</p>	<p>Implementation of SEP.</p> <p>Records, meeting notes, periodically report regarding SEP engagement activities</p> <p>Ongoing follow-up per ESAP.</p>	