

ANNEX-4

Stakeholder Engagement Plan

KUBILAY GEOTHERMAL POWER PLANT PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)



MARCH, 2016
ANKARA



KUBILAY GEOTHERMAL POWER PLANT PROJECT

STAKEHOLDER ENGAGEMENT PLAN

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ABBREVIATION LIST

CO₂	Carbon Dioxide
DSI	General Directorate of State Hydraulic Works (“Devlet Su Isleri”)
ESIA	Environmental and Social Impact ASsessment
ESS	Environmetal and Social Standarts
FGD	Focus Group Discussion
GO	Grievance Officer
GPP	Geothermal Power Plant
MoENR	Ministry of Energy and Natural Resources
MoEU	The Ministry of Environment and Urbanization
NGO	Non-Governmental Organization
PAP	Project Affected People
PDoEU	Provincial Directorate of Environment and Urbanization
PDR	Project Description Report
PRO	Public Relations Officer
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
TKB	Development Bank of Turkey
WB	World Bank

1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the ‘*Kubilay Geothermal Power Plant Project*’ (herein after ‘the Project’). It has been prepared by 2U1K Engineering and Consultancy Inc. on behalf of “*Beştepeler Enerji*” (the Project Company).

The financing of the Project is planned to be located from the Development Bank of Turkey (TKB) through credit line from the World Bank (WB). Thereby the SEP has been prepared in line with the WB’s Environmental and Social Standard 10 (ESS-10)- Information Disclosure and Stakeholder Engagement. In accordance with the ESS-10, the purpose of the SEP is to to guide the Project Company to:

- build and maintain a constructive relationship with the stakeholders, in particular project-affected communities,
- promote improved environmental and social performance through effective engagement with the stakeholders,
- promote and provide means for adequate engagement with project-affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to them and to other stakeholders,
- ensure that all stakeholders have ways to access project information and raise issues,
- ensure that project-affected communities have accessible means to raise issues and grievances, and the Project Company respond to and manage such issues and grievances appropriately.

This SEP includes; (i) the identification of stakeholders for the Project, (ii) analysis of relationships of the stakeholders with the Project, (iii) details of consultation methodologies, (iv) activities carried out to-date and those planned for the future stages of the Project, (v) details of the process for managing stakeholders’ concerns and grievances, and explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

This SEP is owned by the Project Company which is committed to and accountable for its implementation.

1.1 PROJECT OVERVIEW

1.1.1 Geothermal Energy and Turkey

Geothermal sources are mostly formed around active fault systems and volcanic and magmatic units since the Turkey is situated on the Alps – Himalayas belt, Turkey has high geothermal potential and high temperature above 150° C are being used for the electricity production. In terms of geothermal heat and hot springs potential, Turkey is

one of the most populous countries in the World. However, in terms of electricity production and installed capacity, Turkey does not use its all potential sources.

According to Ministry of Energy and Natural Resources (MoENR) geothermal potential of the Turkey is 31,500 MW. Through the mentioned potentials, 79% of the areas are situated in Western Anatolia, 8,5% in Central Anatolia, 7.5% in the Marmara Region, 4.5% in Eastern Anatolia and 0.5% in other regions.

In terms of geothermal resources, 94% are considered to be low and medium heat, and suitable for direct applications (heating, thermal tourism, the output of minerals, etc.), while 6% are suitable for indirect applications (the generation of electricity energy).

There are total of 21 geothermal energy plants in Turkey, and installed capacity of the plants are 635, 15 MW and these plants consist of approximately 1% of the total energy production. These figures are expected to reach 1,000 MW by the end of 2023. (Ministry of Energy and Natural Resource, 2013)

Detailed information about GPPs of Turkey is given in the Table 1-1 below:

Table 1-1 Geothermal Power Plants of Turkey

Name of the Project	Province	Project Company	Installed Capacity
Efeler	Aydın	Güriş Holding	115 MW
Kızıldere 2	Denizli	Zorlu	80 MW
Pamukören	Aydın	Çelikler	68 MW
Galip Hoca	Aydın	Güriş	47 MW
Alaşehir	Manisa	Zorlu	45 MW
Maren	Aydın	Kipaş Holding	44 MW
Dora 3	Aydın	MB Holding	34 MW
Deniz	Aydın	Kipaş Holding	24 MW
Ken Kipaş	Aydın	Kipaş Holding	24 MW
Kerem	Aydın	Kipaş Holding	24 MW
Türkerler	Manisa	Türkerler	24 MW
Pamukören 2	Aydın	Çelikler	23 MW
Kızıldere	Denizli	Zorlu	15 MW
Gümüšköy	Aydın	BM Holding	13 MW
Karkey Umurlu	Aydın	Karadeniz	12 MW
Dora 2	Aydın	MB Holding	9.50 MW
Babadere	Çanakkale	MTN	8.00 MW
Dora 1	Aydın	MB Holding	7.95 MW
Tuzla J	Çanakkale	Enda	7.50 MW

Bereket	Denizli	Bereket	6.85 MW
Tosunlar	Denizli	Akça	3.81 MW

Source: <http://www.enerjiatlası.com/jeotermal/>

As it can be seen from the Table 1-1 above, the Province of Aydın has a significant geothermal potential. Aydın provides 70% of the total geothermal energy production of Turkey. Three Projects in Aydın are in the construction phase, two projects received production licenses, and eight Projects received preliminary licenses including Kubilay GPP.

1.1.2 Kubilay Geothermal Power Plant

Beştepeler Energy was established in Germencik District of Aydın Province in 2015 to perform electricity production and distribution activities. As a result of success of drilling works, the facility has reached the level of establishing geothermal power plant (GPP). General features of the Project are presented below;

Capacity of the Project: The total installed capacity of the plant is planned to be 24 MW. The Project aims to produce 150 million kWh of electricity per year.

Construction and Operation Period: Site preparation and construction period of the Project is planned to be completed in 36 months. The operation period of the Project is estimated to be 30 years.

Employment: It is estimated that a maximum of 25 workers will be required for the construction and operation phases of the Project. Production period is planned to have three shifts. Regional workers will have priority for the employment opportunities. By the date of February 2016, 15 community members of Moralı were employed by the Project.

Project Location and Land Allocation: The Project Area located is in the boundaries of Aydın Province of, Germencik District of Moralı Quarter¹. Project license area covers an area of 3061.57 hectares. There are total of 10 wells that have been opened in a section of the license area. 6 wells are planned for production and 4 wells for reinjection. The production facility that will convert the hot water into energy planned to be built on an area of 16,410 m². The Project Company purchased right to use and ownerships of the area reserved for plant and wellhead, therefore no expropriation has been made. There is only one well area that has been rented; and each well covers approximately 0.6 ha on the average. The license area is planned to be used further for

¹ In 2013, Act 6360 established metropolitan municipalities in all provinces with a population in excess of 750,000. Formerly incorporating only the urbanized central district and the surrounding urbanized districts of the province in which they existed, the new law incorporates all districts, rural and urban, of the province effectively abolishing the province. Within the districts of the newly created metropolitan municipalities, all existing town municipalities, villages, and rural territory were merged with the district centre municipalities so that all districts became second-tier municipalities and villages became Quarter. Since the official status of the settlements in the impact is Quarter village characteristics have been observed.

a second stage project. The total license area is estimated to have the potential to produce 75 MW power from its geothermal reserves.

Project Components: Production wells, water transmission lines, reinjection wells and the power plant are the main components of the power plant project. Details are provided below.

Production wells: In the scope of the Project six production wells are planned. Drilling works of M1, M2, M3, M4, M5, have been completed and drilling works of M6 is ongoing. Project Company is also planning a capacity increase and exploration activities are also going on in the licence area in compliance with national legislative requirements.

Water Transmission Line: Steam obtained from the production well, will be transported to the plant with pressure-resistant and heat-insulated pipes. Production and re-injection wells are planned to be connected via about 3000 m water transmission pipes.

Reinjection Wells: Two reinjection wells are planned to ensure the discharge of geothermal fluid by using a closed system that used during production. Depth of reinjection wells are planned to be about 2000 metres.

Power Plant: Predominantly geothermal fluid will be used for the electricity production, given the amount of raw gas, binary system technology will be implemented during the production process. Units are planned to be installed in the scope of the Project are turbine (modular system), generator, compressor and pump unit. By the disposal of geothermal fluid circulation and sustainability of the system will be ensured.

1.2 PROJECT LOCATION

The Project area is located in the Moralı Quarter of the Germencik District of Aydın (see Figure 1-1).

The Uzunkum Quarter is determined as the closest settlement to the Project area and the distance to the nearest well to the settlement is 600 metres. Second closest Quarter to the nearest well is Moralı with the distance of 800 metres and third closest settlement is determined as Tekin with the distance of 2 km. The Figure 1-1 below represents the closest settlements and their distance to the nearest wells.



Source: GoogleEarth.

Figure 1-1 Project Location

As it can be seen from Google image, the power plant and the wells are located and surrounded by agricultural lands.

2 REGULATORY REQUIREMENTS

This section outlines the regulatory framework for the Project's stakeholder engagement activities, namely:

- Turkish EIA Regulation (2014),
- World Bank Environmental and Social Standards (2014),
- The gaps between Turkish Regulation and World Bank Standards.

2.1 Turkish Legislation

According to the EIA Regulation of 2014 of The Ministry of Environment and Urbanisation (MoEU), an EIA Report is compulsory for geothermal power plants with capacity above MW. However the Project was developed before enforcement of the amended regulation, thereby it is subject to a Project Description Report only (PDR). PDRs were prepared separately for each drilling well and also for the power production. PDRs were approved by Aydın Provincial Directorate of Environment and Urbanization (PDoEU) with the decision that an EIA is not required.

According to the EIA Regulation, a PDR differs from an EIA Report in the context that it does not require public participation meeting and is less detailed in terms of quantification of impacts. Although the Project is not subject to the national EIA requirements, a Public Participation Meeting (PPM) has been conducted in line with the 9th Article of the EIA Regulation.

Box 2-1 Specific Objectives of National EIA Regulation of Turkey (25.11.2014, Article-9)

- 1) *In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.*
 - a) *The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.*
 - b) *Public Participation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.*
- 2) *Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.*
- 3) *Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.*
- 4) *The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.*

2.2 WB Standards

Since the WB is a potential lender for the Project, the project must align with good international practice, including the ESS-10 (Information Disclosure and Stakeholder Engagement) of WB 2014. The specific objectives of ESS-10 are outlined in Box-2-1.

Box 2-2 Specific Objectives of WB Regarding Stakeholder Engagement (30.07.2014)

For all projects, Project Company will consult with stakeholders to identify issues and concerns in order to inform the environmental and social assessment and the design and implementation of the project.

Disclosure of relevant project information helps stakeholders understand the risks, impacts and opportunities of the project. If communities may be affected by environmental or social impacts from the project, the Borrower will provide them with access to the following information:

- (a) The purpose, nature and scale of the project;*
- (b) The duration of proposed project activities;*
- (c) Any risks to and potential impacts on communities and proposed mitigation plans;*
- (d) The envisaged stakeholder engagement process, if any, and opportunities and ways in which stakeholders can participate;*
- (e) The time and venue of any envisaged public consultation meetings, and the process by which meetings are notified, summarized, and reported; and*
- (f) The process and means by which grievances are raised and managed.*

The information will be disclosed in local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project because of their status or groups of the population with specific information needs (such as, literacy, gender, differences in language or accessibility of technical information).

2.3 Gaps between Turkish Legislation and International Guidelines

The most prominent topic, which requires further elaboration in Turkish Environmental Legislation, is “Social Impact Assessment (SIA)”. Additional studies and implementations are required in this topic for internationally financed projects to achieve alignment with international standards. For example, Turkish EIA Regulation does not stipulate implementation of detailed socio-economic surveys at Project Site and the establishment of a Grievance Mechanism. However, these are required by international standards. Such differences will be taken into consideration in respective sections in the ESIA Report.

3 PROJECT STAKEHOLDERS

3.1 Introduction

For the purposes of this SEP, a stakeholder is defined as any individual, organization or group which is potentially affected by the Project or which has an interest in the Project and its impacts. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“affected parties”), or have an interest in the Project (“other interested parties”).

It is important that particular effort is made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update.

3.2 Stakeholder Identification and Analysis

In order to develop an effective SEP, it has been necessary to determine exactly who the stakeholders are and understand their priorities and objectives in relation to the Project. By classifying stakeholders, it has been possible to develop a plan that is tailored to the needs of different stakeholder groups. Different issues are likely to concern different stakeholders and so different types of stakeholders have been grouped based upon their relations to the Project. Having an understanding of the relations of a stakeholder group to the Project helps identify the key objectives of any engagement. Table 3-1 illustrates how each stakeholder is connected to the Project.

Table 3-1 Connection of Stakeholders to the Project

Stakeholder Groups	Stakeholder Type	
	Affected Party	Interested Party
Local Communities		
<ul style="list-style-type: none"> • Muktars of; Morali, Uzunkum, Tekin Quarters • Residents of Morali, Uzunkum, Tekin Quarters • Project workers 	√	
Government		
<ul style="list-style-type: none"> • MoE • Ministry of Labour and Social Security • Aydın PDoEU • Governorship of Aydın • Germencik District Directorate of Agriculture • District Governorate of Germencik 	√	
Local Administrations		
<ul style="list-style-type: none"> • The Metropolitan Municipality of Aydın 		√

Stakeholder Groups	Stakeholder Type	
	Affected Party	Interested Party
• Germencik Municipality		
Project Employees		
NGOs		
<ul style="list-style-type: none"> • Germencik Chamber of Agriculture • Germencik Craftsman's Association • Germencik Olive and Olive Oil Cooperatives • Tariş Fig Agriculture Sales Cooperatives Union • Ortaklar Olive and Olive Oil Cooperatives • Ortaklar Craftsman's Association • Ortaklar Agricultural Credit Cooperatives • Ortaklar Tradesmen and Craftsmen Credit Cooperatives 	√	√
Academics		
• University of Aydin Geothermal Research Centre	√	√
Private Sector		
<ul style="list-style-type: none"> • Magnesköy Thermal Hotel • Other Projects in the Region 	√	√

4 STAKEHOLDER ENGAGEMENT APPROACH

4.1 Overall Approach

The Project will maintain on-going engagement with the national authorities, affected stakeholders and other interested parties to ensure that they are informed about the Project's progress, that they receive information on the environmental and social performance, that they can provide feedback on the effectiveness of any mitigation and management measures and that they have the opportunity to raise any concerns or grievances.

Engagement has been, and will continue to be, undertaken in four successive phases, based upon typical project planning and implementation phases. These phases and the key activities conducted or to be conducted during the engagement process, are detailed in Table 4-1.

Table 4-1. Stakeholder Engagement Approach

Phase	Objectives	Key Activities
Phase 1: Initial Engagement	<ul style="list-style-type: none"> To introduce the Project to the affected and interested stakeholders. To identify key stakeholders to be consulted. To generate feedback on the scope, approach and key issues for the ESIA. To generate feedback on the Project Introduction Files 	<ul style="list-style-type: none"> Collection of secondary data and analysis of the data to identify key stakeholders Holding meetings with community leaders (Mukhtars) Public participation meeting was organized during the PDR stage
Phase 2: Impact Assessment	<ul style="list-style-type: none"> To introduce the Project where necessary. To inform and validate the baseline data through semi-structured interviews and questionnaires To generate feedback on Project activities and have specific discussions regarding potential impacts and proposed mitigation/enhancement and monitoring measures. To manage local expectations, concerns and any misconceptions. To enable stakeholders to input into the Project design and management plans 	<ul style="list-style-type: none"> Semi-structured interviews with Mukhtars; In-depth interviews with selected key stakeholders Household questionnaires; Focus Group Discussions with selected stakeholders

Phase 3: IA Disclosure	<ul style="list-style-type: none"> To make the final ESIA available to all interested and affected stakeholders. Project design and management plans 	<p>On completion of the disclosure and comment period, the ESIA Report will be updated to reflect the results of consultation and comments will be fed into the future work on detailed design and construction of the Project. The Final ESIA and its appendices will be published on the Project Website.</p> <p>Website: will be established</p> <p>Address: Söke yolu üzeri Gümüşyeniköy yanı Germencik / Aydın</p> <p>Tel: +90 256 577 38 39</p> <p>Fax: +90 256 577 47 48</p> <p>Mail: info@karizmaenerji.com</p>
Phase 4: Project Implementation	<ul style="list-style-type: none"> To ensure all affected and interested stakeholders are informed about project progress and have the opportunity to raise any concerns or grievances. To receive feedback on the effectiveness of mitigation and management measures. To manage grievances. 	<ul style="list-style-type: none"> Project updates and progress information will be made available to all affected and interested stakeholders via Mukhtars' offices and other public places and on the Project website. On-going maintenance and availability of the Grievance Procedure to be carried out.

4.2 Stakeholder Engagement Tools

A range of tools were used and will continue to be used for the stakeholder engagement as part of this Project. These include community meetings, focus groups, community level questionnaires, leaflets, posters and key informant discussions. Stakeholder engagement will continue using these employed mechanisms as required ensuring efficient and effective engagement throughout the life of the project.

Specific methods will vary across different stakeholder groups and stakeholder engagement with vulnerable and minority groups will use specifically designed mechanisms, as needed. Vulnerable groups in the context of this project include: people who live with the assistance of others, female-headed households, the physically disabled and the mentally disabled.

Project representatives will be present at key community engagement and information sharing events to demonstrate company commitment to stakeholder engagement, to build relationships and to answer any questions. Information will be presented that is culturally appropriate and easy to understand, using graphics and maps, wherever possible.

In order to ensure that the Project reaches all stakeholders, the Project will utilize a range of different communication tools. These are described in more detail below.

Project Brochures

A brochure for the Project will be developed. It will include detailed information about the Project. It will also outline the environmental and social impact assessment process and provide contact information (email, phone, postal address and fax) for the Public Relations Department of the Project Company for any grievances.

Project Website

A project website will be established. It will contain detailed description of the Project and information about the drilling works, construction of power plant and water pipe and operation process. ESIA report and SEP documents will also be disclosed at the website of the Project. The website will include, digital grievance tools.

Grievance Mechanism

A grievance mechanism will be developed which will allow stakeholders to raise concerns or complaints personally as well as via post or electronic mail. The procedure seeks to address concerns promptly and be readily accessible to all affected stakeholders. The project team will confirm receipt of a complaint within 7 days and find a resolution within 14 days, confirming this in writing to the complainant. A separate formal grievance mechanism will also be developed for those employed in the Project.

Public Relations Officer (PRO)

In order to maintain regular communication with affected communities, a Public Relations Officer (PRO) has been hired. The PROs will be responsible for identifying, informing and recording public views and opinions and for relaying them to the necessary person for follow up (as detailed in the grievance mechanism in Section-7). Contact details for this office are:

- **Name:** Hakan Dinç
- **Address:** Söke yolu üzeri Gümüşyeniköy yanı Germencik / Aydın
- **Tel:** +90 256 577 38 39
- **Fax:** +90 256 577 47 48
- **Mail:** info@karizmaenerji.com

Public Participation Meeting

The “Public Participation Meeting” was conducted on June 5, 2015 at the coffeehouse of Moralı Quarter. An announcement was published 3 days before the date of the meeting. The local (Finans Denge) newspaper was used for the announcement which advertised the date of meeting, time, place, and subject of the meeting. Totally twenty-seven people attended to the meeting. Information has given about the investment, and the company officials and the ESIA team made presentations. Ideas and suggestions were taken about the project.

The main concerns of the community members about the Project are listed below;

- Possible impacts of the Project on agricultural lands,
- Possible impacts of CO₂,

- Employment opportunities, especially for young and female population,
- General information about the wells
- Noise impacts of the Project

Community Level and Household Surveys

With the Community Level and Household Surveys, primary data collection has been obtained to focus on the community level assessment in terms of describing environmental and social aspects of the Project. The aim of the primary data collection was the gathering qualitative and quantitative information from the primary and stakeholders such as Mukhtars and affected people. The summary of the surveys are provided in the below sections. Details of the surveys will be presented in the ESIA report.

4.3 Results of Surveys

4.3.1 Moralı Quarter

According to information gathered from the community level surveys, total population of the settlement is 586, the number of the households are 164 and average household size is determined as 3.5. The main income generating activities of the majority of the population are; agriculture and animal husbandry and main agricultural productions are; cotton, wheat, corn, olives and figs.

According to information gathered from the Mukhtar, majority of the community are familiar with the Project. However, community members are not satisfied with the level of information provided to them. General perspective of the Mukhtar related with the Project is assessed positive as a result of employment opportunities and prices paid for their lands. However, it is assumed that the environmental impacts such as odour creates complaints related with the Project.

4.3.2 Uzunkum Quarter

Referring to community level survey, total population of the settlement is 140, the number of the household is 40 and the average household size is determined as 3,5. Mukhtar stated that, population of the Quarter decreased due to lack of income sources. Animal husbandry and agriculture constitutes the main income source of the population and wheat, corn, cotton are the main agricultural products.

According to the interview with the Mukhtar, majority of the community is familiar with the Project. However, community members are not satisfied with the level of information they are provided. General perspective of the Mukhtar related with the Project is assessed negative as a result of environmental impacts of the Project such as odour, noise and mud of drilling works.

4.3.3 Tekin Quarter

As Mukhtar of Tekin indicated, total population of Quarter is 273, the number of household is 106 and average household size of the settlement is 2,5. The settlement is nonhomogeneous in terms of ethnic groups, approximately half of the population is *Alevi* and half of the population is *Muhajir*. Animal husbandry and agriculture constitutes the main income source of the population, and wheat, corn, cotton are the main agricultural products.

According to information gathered from the Mukhtar majority of the community are familiar with the Project. However, information level of the community members is not adequate. General perspective of the Mukhtar related with the Project is assessed neutral. However, other projects located close to the settlement created a prejudgement for geothermal projects.

4.4 Focus Group Discussions

FGD provides to engage specific sections of the community that might require special attention in consultation, e.g. female, young population, vulnerable people. FGD is an effective way to collect together people from similar experiences to discuss a specific interest related with the Project. In February 2016, 6 FGDs disaggregated according to community, gender with affected communities in 3 villages. Outputs of FGDs are presented in Table 4-2 below;

Table 4-2 Outputs of FGDs

MORALI QUARTER	
Female Meeting	Male Meeting
<p>Project Information</p> <ul style="list-style-type: none"> - 25 female living in the Quarter are employed in the company of Taris - Young people living in the Quarter are employed by Project; as a result of this situation female group has information. However, they assumed that this information is not adequate. - There is demand for a special briefing for female groups - Complaints are considered to be collected by the Mukhtar <p>Impacts and Comments</p> <ul style="list-style-type: none"> - There is a concern related with the Project that may create occupational diseases on employed population - The community members are satisfied by the land allocation in terms of land prices <p>Project activities damage agricultural products time to time but it is being compensated by the Project Company</p>	<p>Project Information</p> <ul style="list-style-type: none"> - Male population of Quarter assumed that information disclose of the Project is not adequate - Community members expect an information meeting which explains Project impacts in detail - Community members have concerns related with grievance mechanism. - 30-40 community members attended to the protest against to Geothermal Projects in Germencik. <p>Impacts and Comments</p> <ul style="list-style-type: none"> - The community members have concerns with land allocation. They indicated that people sell their agricultural lands because of land acquisition concerns. - There should be an information meeting especially to the farmers that explains impacts of the Project on agricultural products. - Testing activities are polluting the

	<p>Menderes River.</p> <ul style="list-style-type: none"> - Big vehicles are damaging roads and traffic load of the vehicles creates security weakness. <p>Community members have bias opinions related with GPPs since the previous Project experiences created negative impacts</p>
UZUNKUM QUARTER	
Female Meeting	Male Meeting
<p>Project Information</p> <ul style="list-style-type: none"> - According to information indicated from the meeting, all females of the settlement are unpaid family worker - There is demand for a special briefing for female groups - They suggested free phone line number for grievances <p>Impacts and Comments</p> <ul style="list-style-type: none"> - Testing process of the wells is polluting the Menderes River - Menderes River is being used for the animals and polluted River may damage their health <p>Especially during the night noise impact of the Project is sensible</p>	<p>Project Information</p> <ul style="list-style-type: none"> - The group stated that the population of the settlement do not have detailed information of the Project <p>Impacts and Comments</p> <ul style="list-style-type: none"> - Project created negative impacts on agricultural products - Testing water damaged fishes - Testing process creates odour problem - Mud problem occurred as a result of drilling works - Pipes of state hydraulic works (DSI) pollutes as a result of discharging of testing water - There is a concern of pollution of groundwater <p>There is a concern related with earthquake</p>
TEKİN QUARTER	
Female Meeting	Male Meeting
<p>Project Information</p> <ul style="list-style-type: none"> - Project Company should organize a Project Introduction Meeting - The population of the Quarter is planning to resist GPP in the area <p>Impacts and Comments</p> <ul style="list-style-type: none"> - The main concern related with GPP is discharging of testing water - Traffic load increased due to Project and it creates safety problems especially with the children - Project Company should monitor project workers about speed limits - There is a concern related with population decrease due to extensive GPPs. - An independent organization such as University should provide information about the Project <p>There is a concern of pollution of groundwater</p>	<p>Project Information</p> <ul style="list-style-type: none"> - Environmental Impact of Kubilay GPP will be minimum when it compared with the other Projects. - State hydraulic works should not give permission of discharging of testing water to the channels. - The other Projects around the settlement created high environmental problems - Legal process has been started related with other GPPs. <p>Impacts and Comments</p> <ul style="list-style-type: none"> - The settlement is located in the middle of three GPPs and as a result of this situation complaints are high when it compared with the other Quarters. - Especially land allocation processes of those Projects creates security impact and unknown people are visiting the settlement - Agricultural products especially the quality and production level of fig has been decreased. - Project Companies are not providing health information regarding to impacts.

	<ul style="list-style-type: none"> - Turkish Medical Association organized a meeting at the coffeehouse and they provided information about relation between cancer and GPP. - Government should establish a monitoring mechanism for GPPs <p>GPPs will create visual pollution, especially Water pipes and cultural heritage located in the village will lose value (Magnesia Ancient City)</p>
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4.5 In-depth Interviews with the Key Stakeholders

Key informant interviews are a common data collection technique during the stakeholder engagement process since the key informants are well informed on their community and its inhabitants as a result of their professional background, leadership responsibilities or personal experience, key informants have specific knowledge or expertise about some aspects of the emergency, the area, the community, a specific sector or a sensitive issue. Typically, a key informant represents a non-governmental institution and academy. The Table 4-3 summarizes the information level and comments of local interviewees.

Table 4-3 Outputs of Key Informant Interviews

Name of The Institution	Information Level	Information Tool	Cooperation Level	Comments and Suggestions
Aydın University	Adequate	Project workers	Inadequate	Academic projects and meetings
Germencik Chamber of Agriculture	Adequate	Project workers and Municipality	Adequate	Environmental Awareness and academic meetings related with impacts of the project
Germencik Craftsman's Association	Inadequate	Municipality and Chamber of Agriculture	Inadequate	-
Germencik Olive and Olive Oil Cooperatives	Inadequate	Project workers	Inadequate	-
Municipality of Germencik	Inadequate	Project workers	Inadequate	Cooperation with other companies, Information tools should be accessible
Magnesköy Thermal Hotel	Inadequate	Project workers	Inadequate	Information Disclosure
Tariş Fig Agriculture Sales Cooperatives Union	Adequate	Non-Governmental Organizations	Inadequate	Conflict of Interest, information tools should be accessible

Name of The Institution	Information Level	Information Tool	Cooperation Level	Comments and Suggestions
Ortaklar Olive and Olive Oil Cooperatives	Inadequate	Media and Internet	Inadequate	Information Disclosure
Ortaklar Craftsman's Association	Inadequate	Project workers	Inadequate	Information inadequate Disclosure and Public participation meeting
Ortaklar Agricultural Credit Cooperatives	Inadequate	Media and Internet	Adequate	-
Ortaklar Tradesmen And Craftsman Credit Cooperatives	Inadequate	Internet	Inadequate	Information Disclosure and Cooperation during the recruitment process

- As can be seen from the Table 4-3 above majority of the institutions indicated that they do not have adequate information regarding to Project.
- Most of the interviewees assumed that main information tools are Project workers, internet and media.
- 70% of the institutions stated that cooperation level is not adequate and mainly information meetings are suggested

Main Impacts and participation levels of the interviews related with the potential impacts of the Project are presented in the Table 4-4 below:

Table 4-4 Participation Levels of about Positive and Negative Impacts of the Project

Impact & Concern & Expectation	Participation Level (%)
Damage on Nature	80
Stakeholder Engagement will be provided	63
Positive impact on national economy	91
Positive impact on regional economy	72
Employment opportunity	60
air pollution, noise, moisture	60

5 FUTURE STAKEHOLDER ENGAGEMENT

This section describes the stakeholder engagement planned for the Project during Impact Assessment (IA) disclosure, and then during construction and operation.

5.1 Phase 3: ESIA Disclosure

Disclosure of the Draft ESIA Report will provide detailed information about the Project activities, assessment of the impacts and the planned mitigation measures and monitoring activities. After submitting the Draft ESIA Report to the lenders, it will be advertised and made available for public review. According to ESS-10

“The Borrower will tailor its consultation process to any specific language preferences of the project-affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. The Borrower will inform those who have participated in the public consultation process in a timely manner of the final decision on the project, associated environmental and social mitigation measures and any benefits of the project for the local communities, along with reasons and considerations on which the decision is based, and the grievance or complaint mechanism or process available.”

Display venues would be expected to include:

- The Germencik Municipality;
- Moralı, Uzunkum and Tekin Quarters;
- Local government and
- The Project office.

A community meeting will be held to disclose the ESIA. Electronic copies of the Draft ESIA Report will be made available on CDs/memory sticks and a Non-Technical Summary of the Draft ESIA Report with its appendices will be distributed to select stakeholders registered on the database. Copies of the Draft ESIA Report will also be made available for download from the Project website.

Directly affected stakeholders will be informed about the disclosure process by phone and a letter will be sent to key stakeholders. The purpose of this letter will be to inform stakeholders about the disclosure. The project team will answer questions from the public and stakeholders. The Public Relations officer of the Project will be responsible for receiving and collecting all comments. All received comments will be fed into the ESIA finalization process and the Final Report will be posted on the Project website.

5.2 Project Implementation

Stakeholder engagement will continue throughout design finalization, construction and operation. Key stakeholders will be kept informed about the progress of the Project, have the opportunity to provide feedback on the effectiveness of mitigation and

enhancement measures and to raise any concerns or grievances. Information to be shared before construction commences will include (but is not limited to) the following:

- the impacts that have been identified as a result of the Project,
- the impacts and mitigation or enhancement measures that are being implemented,
- the implementation schedule,
- roles and responsibilities,
- monitoring and management measures, and
- information on the grievance mechanism for the Project.

Implementation phase engagement will focus on new stakeholders, including children and potential and existing employees, as well as those engaged at earlier phases; it will focus on developing relationships thorough on-going stakeholder engagement and will be designed to build on positive stakeholder relationships established during the ESIA process, carrying these forward through Project construction and operation.

To ensure effective stakeholder engagement, the SEP will be reviewed annually by the PRO throughout construction and operation of the Project, with it being adapted as appropriate.

Project's public relations team will be responsible for engagement with stakeholders as an on-going process throughout the life of the Project. This department will be dedicated to conveying information about the Project, finalizing, and implementing the ESIA mitigation measures.

A robust grievance mechanism for workers in both construction and operation stages will be developed by the Project Company before commencement of either activity. Once finalized, this process will be managed separately from the public grievance mechanism, but employees will retain their right to access the public grievance mechanism for non-employment-related issues.

6 GRIEVANCE MECHANISM

6.1 Overview

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities and other stakeholders.

A grievance management process will be established for the Project. This will provide a formal and on-going avenue for stakeholders to engage with the Project. This grievance mechanism will be accessible to all sections of the affected community, at no cost and will not impede access to other judicial or administrative remedies. Affected communities will be repeatedly informed about the grievance process over the course of community engagement activities.

Stakeholders will be able to share their opinions and grievances via a range of options such as web sites, letters and face to face meetings during all future phases of the Project. Feedback will also be provided to demonstrate how their comments and suggestions have been incorporated into the Project decision-making process in the second public participation meeting and this process will be continue in all phases of the Project. A separate grievance mechanism will be established for Project workers.

Grievance procedures will be coordinated through the nominated Grievance Officer who will feed the grievances through to the Project Company's PRO, who is the primary interface between the community and the Project Company. Confidentiality procedures will be put in place to protect the complainant, as appropriate.

The grievance mechanism will be advertised and announced to affected stakeholders so that they are aware of the process, know they have the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with one of the company's PROs.

6.2 The Grievance Mechanism

There are 10 steps that complete the grievance mechanism. This process has been summarized in Figure 7.1, and has been detailed in the text below.

Step 1: Identification of grievance through personal communication with appropriately trained and advertised Project Company workers (GOs/PROs). This could be in person, by phone, letter, or email using the contact details below:

- **Name:** Hakan Dinç
- **Address:** Söke yolu üzeri Gümüşyeniköy yanı Germencik / Aydın
- **Tel:** +90 256 577 38 39

- **Fax:** +90 256 577 47 48
- **Mail:** info@karizmaenerji.com

Step 2: Grievance is recorded in the 'Grievance Log' (paper and electronic) within one day of identification. The grievance log will be held at the Project Company's offices and managed by the PRO. The significance of the grievance will then be assessed within five to seven days using the criteria outlined in Box 7-1.

Box 6-1 Significance criteria

Level 1 Complaint: A complaint that is isolated or 'one-off' (within a given reporting period - one year) and essentially local in nature.

Note: Some one-off complaints may be significant enough to be assessed as a Level 3 complaint e.g., when a national or international law is broken (see Level 3).

Level 2 Complaint: A complaint that is widespread and repeated (e.g., dust from construction vehicles).

Level 3 Complaint: A one-off complaint, or one which is widespread and/or repeated that, in addition, has resulted in a serious breach of the Project Company's policies or National law and/or has led to negative national/international media attention, or is judged to have the potential to generate negative comment from the media or other key stakeholders (e.g., inadequate waste management).

Step 3: Grievance is acknowledged through a personal meeting, phone call, or letter as appropriate, within a target of 10-14 working days after submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

Step 4: The Grievance Officer is notified of Level 1, 2 or 3 grievances and the Project Manager/Director is notified of all Level 3 grievances. The senior management will, as appropriate, support the Grievance Officer in deciding who should deal with the grievance, and determine whether additional support for the response is necessary.

Step 5: The GO delegates the grievance within five to seven days via e-mail to relevant department(s)/personnel to ensure an effective response is developed (e.g., HR, relevant administrative departments, contractors etc.)

Step 6: A response is developed by the delegated team and Grievance Officer within 14 days, with input from senior management and others, as necessary.

Step 7: The response is signed-off by the senior manager for level 3 grievances and the Grievance Officer for Level 2 and Level 1 grievances within 14 days. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the Grievance Officer and referred to in the grievance log.

Step 8: Communication of the response should be carefully coordinated. The Grievance Officer ensures that an approach to communicating the response is agreed and implemented.

Step 9: Record the response of the complainant to help assess whether the grievance is closed or whether further action is needed. The Grievance Officer should use appropriate communication channels, most likely telephone or a face to face meetings, to confirm

whether the complainant has understood and is satisfied with the response. The complainant’s response should be recorded in the grievance log.

Step 10: Close the grievance with a sign-off from the Grievance Officer. The Grievance Officer assesses whether a grievance can be closed or whether further attention is required. If further attention is required the Grievance Officer should return to Step 2 to re-assess the grievance. Once the Grievance Officer has assessed whether the grievance can be closed, he/she will sign off or seek agreement from the Project Manager for level 3 grievances, to approve closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which will be filed by the Grievance Officer and referred to in the grievance log. In addition, a “Grievance Closeout Form” will be used. (See: Annex 1-1). This process is outlined in Figure 6-1.

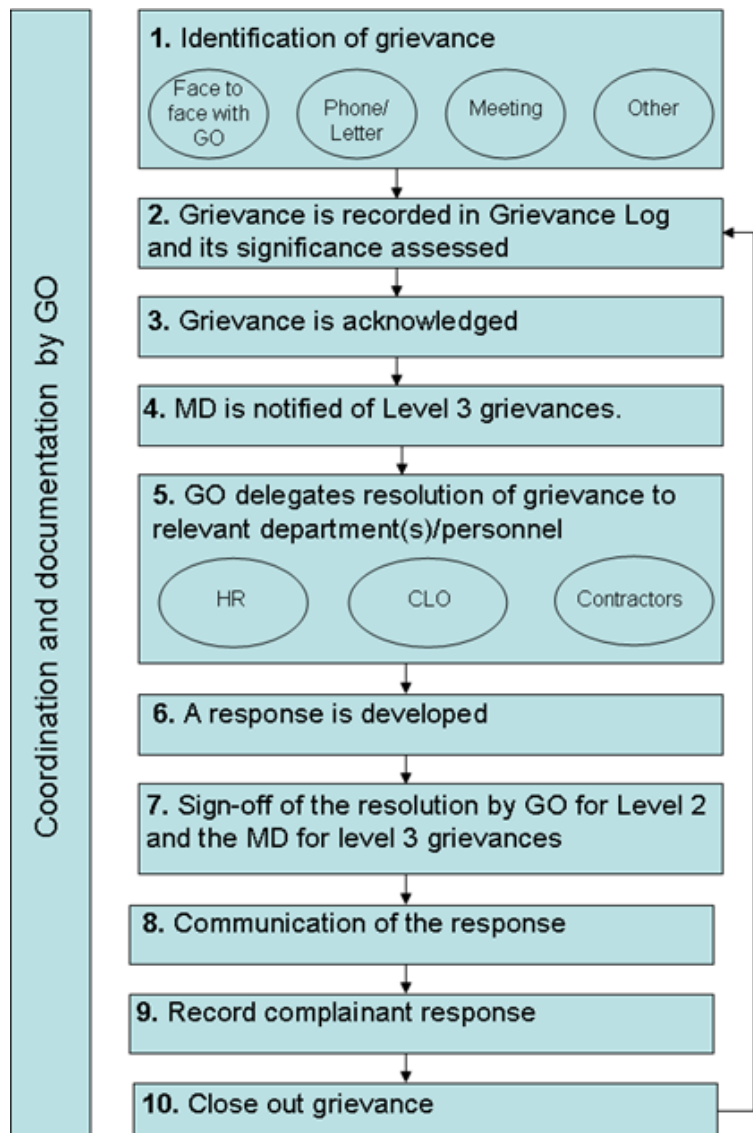


Figure 6-1 Flowchart for Processing Grievances

6.3 Grievance Procedure Channels of Communication

Numerous channels will be used for stakeholders to submit any complaints and requests:

- Telephone – All incoming calls will be registered and information summarized daily and sent to the relevant department for processing and action in accordance with the grievance procedure outlined above.
- Electronic channels – Stakeholders have the opportunity to send comments, remarks, requests and complaints via the official website of the Project Company.
 - Post – Mail can be used by stakeholders for submission of their queries/requests/complaints/comments for consideration by the PRO. All incoming letters will be documented and stored as well as the responses sent to the originating party in accordance with the grievance procedure outlined above.
 - Name: Hakan Dinç
 - Address: Söke yolu üzeri Gümüşyeniköy yanı Germencik / Aydın
- Any queries/requests/complaints/comments can be brought to the attention of the Project Company verbally or written (e-mail) or by filling in a Grievance Form which will be available in the project site office (See Annex 1-2).

ANNEX 1 SAMPLE OF GRIEVANCE CLOSEOUT FORM

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <input type="checkbox"/> NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.

Notes:

Name-Surname and Signature

Date..../...../.....

Of the Complainant:
Institution/Company

Representative of the Responsible
Title-Name-Surname and Signature

ANNEX 2 SAMPLE OF GRIEVANCE FORM

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent.

Reference No	
Full Name	
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address <input type="checkbox"/> By telephone:..... <input type="checkbox"/> By e-mail:.....
Province/Town/Settlement	
Date	
Category of the Grievance	
1. On assets/properties impacted by the project	
2. On infrastructure	
3. On decrease or complete loss of sources of income	
4. On environmental issues (like pollution)	
5. On employment	
6. On traffic, transportation and other risks	
7. On land allocation	
8. Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	
What would you like to see happen to resolve the problem?	

Signature:

Date