
ALARKO TARIM

Geothermal Resource Exploration Drilling and Greenhouse Project

STAKEHOLDER
ENGAGEMENT PLAN
(SEP)

NATA 

FEBRUARY 2025

ANKARA



ALARKO TARIM

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STAKEHOLDER ENGAGEMENT PLAN

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ABBREVIATIONS

Aol	Area of Influence
CoC	Code of Conduct
EHS	Environment, Health, and Safety
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
IFC	International Finance Corporation
OHS	Occupational Health & Safety
PPE	Personal Protective Equipment
PS	Performance Standards
SEP	Stakeholder Engagement Plan
TSKB	The Industrial Development Bank of Turkey
WB	World Bank

1 EXECUTIVE SUMMARY

Alarko Tarım, under the roof of Alarko Holding, carries out production in greenhouse campuses of over 1000 decares in Afyon and Denizli. Alarko Tarım acquired Nata Tarım, which was operating in the region, to establish a new campus in Eskişehir. The share acquisition took place on 07.05.2024. The project components were initially planned to be gathered under the name Alsera, but this plan was changed, and it was decided to be gathered under Nata Tarım (Project Owner). The Project Owner carries out Geothermal Resource Exploration Drilling and Greenhouse cultivation activities in Eskişehir Province, Mahmudiye District, İsmetpaşa Neighbourhood and plans to establish a total net 850 decares of greenhouse production area. These 850 acres consist of Eskişehir-20, and Eskişehir-21 greenhouses and 775 acres of the investment will be new (Greenfield) greenhouse investment. Information on Eskişehir-20 and Eskişehir-21 greenhouse areas is presented below and summarised in [Table 2-1](#).

Nata Tarım aims to bring these resources into the economy and increase agricultural productivity in the region through modern greenhouse activities and geothermal resource exploration and utilisation. The Project Owner plans to construct a new greenhouse of 40.8 acres in addition to the 76.4 acres currently under production. This area is named as Eskişehir-20 greenhouse.

There are 5 production wells and 1 reinjection well for the currently operating greenhouse area in the Nata Tarım campus. The existing infrastructure of Nata Tarım will be expanded with the Project infrastructure.

In addition, a new greenhouse will be built on 813 decares of land and the net greenhouse production area will be 734 decares. This greenhouse is named as Eskişehir-21 greenhouse. In the Eskişehir-21 greenhouse, production will be carried out using an area of approximately 813 acres with 3 greenhouse compounds. With these two greenhouse areas where hydroponic agriculture will be carried out, the net production area will increase to 850 acres.

It is planned to drill 17 production and 9 reinjection wells to meet the energy needs of Eskişehir-21 Greenhouse areas. The characteristics of the geothermal wells will be determined by drilling tests; thus, the number and locations of the wells will be finalised according to the energy requirement.

For the implementation of the Project, potential financing is requested from the Industrial Development Bank of Turkey (TSKB) for the construction of an 850-acre greenhouse compound, wells to meet the energy needs of the compound, reinjection wells, cold water wells, heat centre construction, energy transmission line, packaging areas, administrative building construction and Alarko Tarım Academy construction and other project components related to these areas.

Therefore, the Project Owner commissioned 2U1K to prepare an Environmental and Social Due Diligence (ESDD) report, Stakeholder Engagement Plan (SEP) and Environmental and

Social Management Plan (ESMP) in line with national legal requirements, World Bank Operational Policies and TSKB Geothermal Development Project Environmental and Social Management Framework. The Project commenced in February 2024 under the name Alsera and was revised in December 2025 under the name Nata Tarım.

It is planned to grow mainly summer crops such as truss and pink tomatoes, peppers, cucumbers and seed crops in the greenhouses, and the crop varieties can be changed according to the needs.

Within the scope of the project, Gürlük Geothermal Energy Agriculture Greenhouse Food Industry and Trade Incorporated Company, and after the merger of the company, on 21.05.2024, Alsera Geothermal Agriculture Food Industry and Trade Incorporated Company (Validity date: 25/04/2026) and operating licence (Validity date: 24/06/2046).

Nata Tarım has an operating licence with a validity date of 04/06/2043.

Within the scope of the project, Dünyaçed Engineering Consultancy and Environmental Consultancy Ind. Trade. Co. Ltd. Within the scope of Environmental Impact Assessment Regulation, Gürlük Geothermal Energy Agriculture Greenhouse Food Industry and Trade Inc. within the scope of Environmental Impact Assessment Regulation, and the decision of 'Environmental Impact Assessment is not required' was taken on 04.07.2024.

Currently, the land acquisition process has been completed and a total area of 2,390,259.96m² has been purchased from 20 people. All land acquisition was made through voluntary purchase method, and 67 parcels were purchased in total. The lands were purchased from the owners and there are no previous tenants or users on the lands. If the need for land acquisition arises in the future, the project owner will adopt the voluntary purchase approach for these lands as well.

Currently, construction works have not started. The Project is in the planning and design phase. Drilling works and greenhouse construction works are planned to start in 2025 and be completed in 2026. The project work plan is given in **Figure 2-1** and presented in the annexes. Detailed work plans are being prepared.

A precise construction plan has not yet been developed, and 21 workers are expected to work in the first well drilling. After the first drilling, the well data will be evaluated and the work in other wells will start according to the data to be obtained from here. After the first well, it is aimed to drill 5 wells at the same time and 105 people are expected to work. During the greenhouse construction phase, it is expected that there will be approximately 750 employees at the highest period for the construction of 850 acres of net greenhouse campus. During the operation phase, it is foreseen that one person will work per acre and approximately 900 people are expected to be employed in the greenhouses. The project owner will prioritise local employment and women's employment during both construction and operation. The ratio of female employees is expected to be around 90% during the greenhouse operation period.

The closest settlement to the project is İsmetpaşa Neighbourhood, which is 1.5 km away. In addition, two stock farms located 200 metres and 700 metres from parcels 121, block 33, 34, 35, which are among the areas where land acquisition has been completed in the project, are included in the project impact area.

An ESMP has been prepared that includes mitigation measures to be taken to prevent or reduce the adverse environmental and social impacts of the Project to acceptable levels. In addition, the Project-specific SEP defines the Project owner's commitments and strategy for effective communication with stakeholders throughout the life of the Project. SEP will be updated with the Project development.

2 PROJECT DESCRIPTION

2.1 Project Location and Project Overview

Alarko Tarım produces in greenhouse compounds of over 1000 decares in Afyon and Denizli under the roof of Alarko Holding. In order to establish a new campus in Eskişehir, Alarko Tarım acquired Nata Tarım, which has a 193 acres geothermal greenhouse campus located on parcels 131-1, 132-1 and 132-2 in the region. The share acquisition took place on 07.05.2024. The project components were initially planned to be gathered under the name Alsera, but this plan was changed, and it was decided to be gathered under Nata Tarım (Project Owner). The Project Owner carries out Geothermal Resource Exploration Drilling and Greenhouse Farming activities in Eskişehir Province, Mahmudiye District, İsmetpaşa Neighbourhood and plans to establish a total net 850 decares of greenhouse production area. These 850 acres consist of Eskişehir-20 and Eskişehir-21 greenhouses and 775 acres of the investment will be new (Greenfield) greenhouse investment. Information on Eskişehir-20 and Eskişehir-21 greenhouse areas is presented below and summarized in [Table 2-1](#).

Nata Tarım aims to bring these resources into the economy and increase agricultural productivity in the region through modern greenhouse activities and geothermal resource exploration and utilisation. The Project Owner plans to construct a new greenhouse of 40.8 acres in addition to the 76.4 acres currently under production. This area is named as the Eskişehir-20 greenhouse.

In addition, a new greenhouse will be constructed on 813 acres of land and the net greenhouse production area will be 734 acres. This greenhouse is named as Eskişehir-21. With these two greenhouse areas where hydroponic agriculture will be realised, the net production area will increase to 850 acres. For the realisation of the Project, the Project Proponent is requesting potential financing from the Industrial Development Bank of Turkey (TSKB) for the construction of a net 850 acres greenhouse compound, wells to meet the energy needs of the compound, reinjection wells, cold water wells, heat centre construction, packaging areas, administrative building construction and Alarko Tarım Academy construction and other project components related to these areas.

Therefore, the Project Owner commissioned 2U1K to prepare an Environmental and Social Due Diligence (ESDD) report, Stakeholder Engagement Plan (SEP) and Environmental and Social Management Plan (ESMP) in line with national legal requirements, World Bank Operational Policies and TSKB Geothermal Development Project, Environmental and Social Management Framework.

It is planned to start in 2025 and be completed in 2026. The current greenhouse area of Nata Tarım is 76.4 decares, 40.8 decares of new greenhouse area will be established. In Eskişehir-21 greenhouse, production will start using an area of approximately 813 acres with 3 greenhouse compounds. [Table 2-2](#) provides a summary of the area information for Eskişehir-21 and Eskişehir 20 plots and [Table 2-1](#) shows the layout of Eskişehir-21. Although all

greenhouse settlements will be established on the parcels (**Table 2-3**) for which land acquisition has been completed, the net and gross areas of greenhouses may change due to the ongoing project design phase.

Table 2-1. Gross and net areas of greenhouse compounds

	Eskişehir-20 Greenhouse		Eskişehir-21 Greenhouse	Total
Gross Area	120 acres		813 acres	933 acres
Net Production Area	Available	New (Greenfield)	New (Greenfield)	850 acres
	76.4 acres	40.8 acres	734 acres	

For the Project, which is still in the planning phase, 2U1K has carried out 4 site visits and prepared the Environmental and Social Management Plan as an annex to the ESDD, including the assessment results obtained during the site visits. The impacts and mitigation measures identified in the ESDD, and its annexes also cover the existing greenhouse area.

It is planned to grow mainly summer crops such as truss and pink tomatoes, peppers, cucumbers and seed crops in the greenhouses, and the crop varieties can be changed according to the needs. The project work flow diagram is given in **Figure 2-1**.

In addition to the greenhouses, the Administrative Building and Alarko Tarım Academy constructions are also within the scope of the Project.

In addition, it is planned to establish social facilities in the campus in the following stages. Among these social facilities, buildings that can provide social services such as training centre for employees, lodging, nursery for the children of employees, etc. are planned.



Figure 2-1. Workflow Diagram

It is planned to drill 17 production and 9 reinjection wells to meet the energy needs of the greenhouse areas. The characteristics of the geothermal wells will be determined by drilling tests, thus the number and locations of the wells will be finalised according to the energy requirement. In addition, meeting a portion of the energy requirement from Nata Tarım's 5 production and 1 reinjection wells in operation is considered in the designs. The tentative locations of the first wells are shown in **Figure 2-2**.

In case of positive results from the drilling works in the wells, geothermal based hydroponic greenhouse settlements will be established.

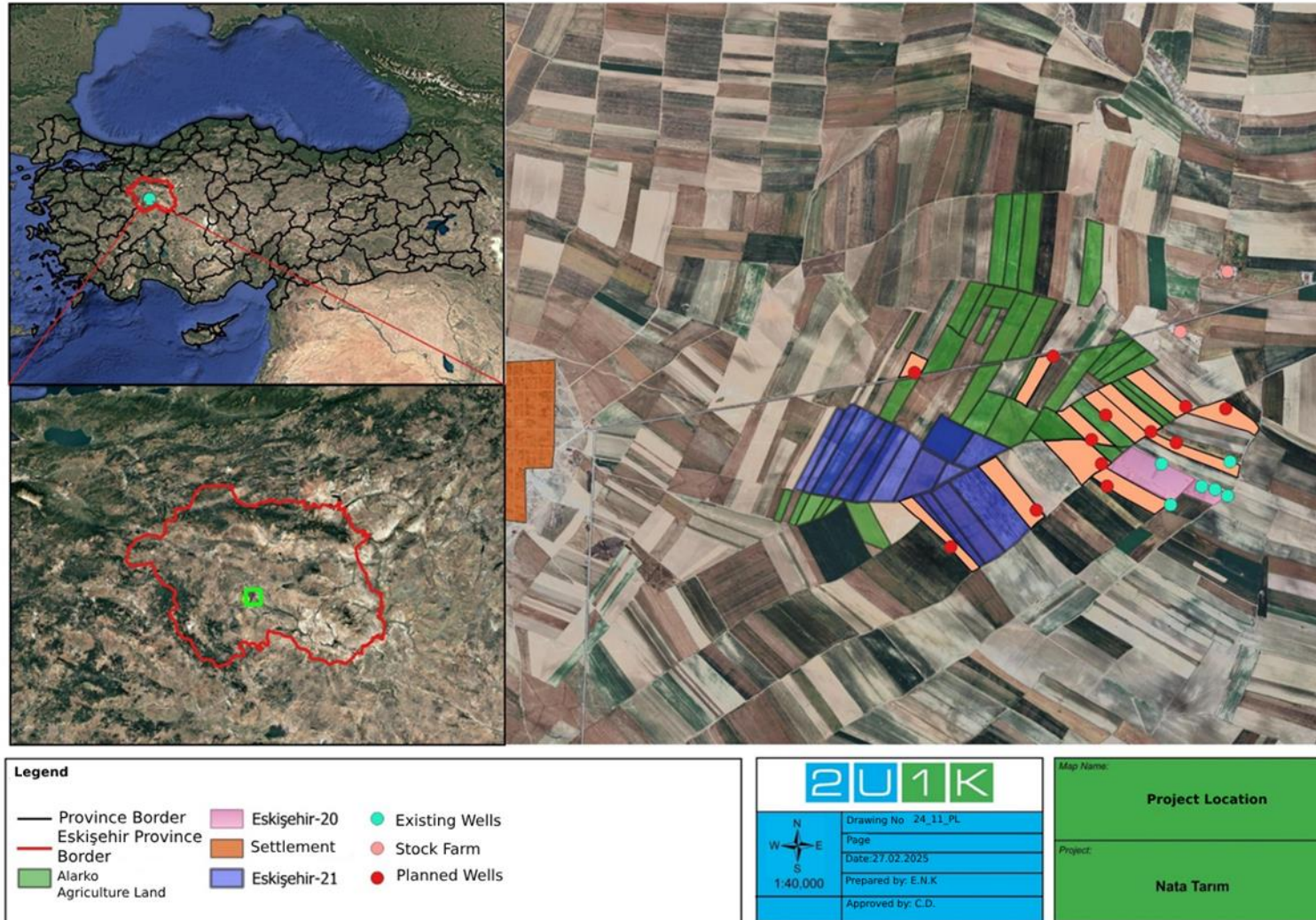


Figure 2-2. Greenhouse areas and location of wells

The geothermal resource exploration licence numbered 2024-14 obtained by the project owner is valid from 25/04/2023 to 25/04/2026 and the operating licence numbered 2024-15 and dated 24/06/2016 is valid until 24/06/2046. The exploration and operation licences were first granted to Gürlük Geothermal Energy Agriculture Greenhouse Food Industry and Trade Inc. (Gürlük), and after the company merger, on 21.05.2024, Alsera Geothermal Agriculture Food Industry and Trade Inc. and will be revised on behalf of Nata Tarım.

The exploration licence area is 1034.12 ha, and the operation licence area is 2225.65, and the operation licence area consists of two polygons. 1st Polygon is 1648.15 ha and 2nd Polygon is 577.50 ha.

Nata Tarım has a 10000-ha operation licence numbered IR:2022-08 (ER:3422598). The licence has a term from 04/06/2013 to 04/06/2043.

For the project, Dünyaçed Engineering Consultancy and Environmental Consultancy Ind. Trade. Co. Ltd. prepared the Project Introduction Document¹ on behalf of Gürlük and submitted it to the Governorship of Eskişehir on 28.03.2024.

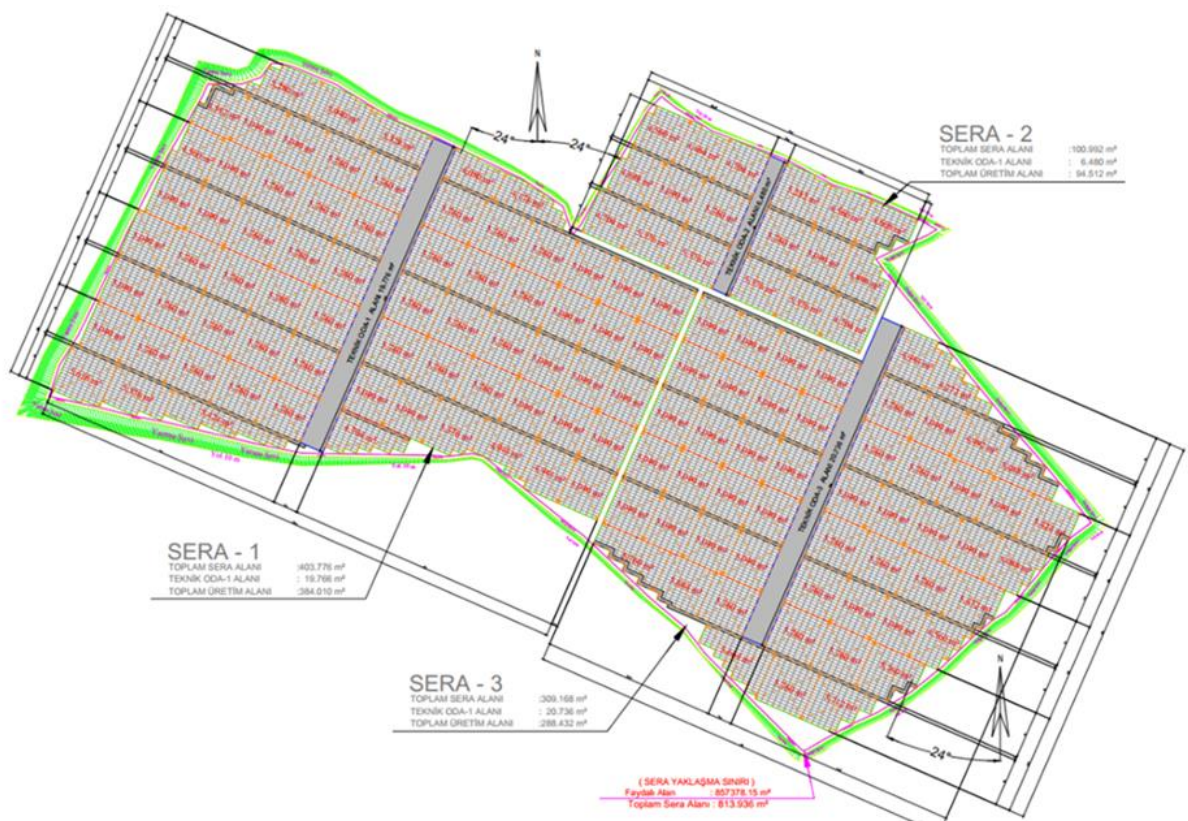
After the examination of the Governorate, the EIA process of the project started on 15.04.2024. On 04.07.2024, in accordance with Article 17 of the EIA Regulation, the Governorate decided that 'Environmental Impact Assessment is not required' for the Geothermal Resource Exploration Drilling and Greenhouse Activity Project at Site No: IR:2023-02 (ER:3339672). 43549071 220-02 'Environmental Impact Assessment is Not Required' decision with decision number E-2024139 is given in Annex-B as an attachment to the report.

Currently, the land acquisition process has been completed, and the ownership of the Project area belongs to Beybur Agriculture and Livestock Inc. It is planned to transfer the shares of Beybur Agriculture and Livestock Inc. to Nata Tarım at a later stage. According to the current data obtained from the project owner, a total area of 2,390,259.96 m² has been purchased from 20 people. The lands have been purchased from the owners and there are no formal or informal users in these areas. All land acquisition was made by voluntary purchase method, and 67 parcels were purchased in total. The voluntary procurement approach will be adopted for the later phases of the Project and if land acquisition is necessary, the processes will be carried out in accordance with World Bank OP 4.12. The lands in the area where the project will be realised have the characteristics of fields.

¹ Geothermal Resource Exploration Drilling and Greenhouse Operation at Site No: IR:2023-02 (ER:3339672)

Table 2-2. Eskişehir-21 and Eskişehir-20 Greenhouse area details

		Production Area (m ²)	Technical Area (m ²)	Total Greenhouse Area (m ²)	Production Area (m ²)
Eskişehir-21	Greenhouse -1	369.336	19.766	14.674	403.776
	Greenhouse -2	90.003	6.480	4.509	100.992
	Greenhouse -3	275.900	20736	12.532	309.168
Total		735.239	46.982	31.715	813.936
Eskişehir-20	20 C	38.520	1.850	1.870	42.240

**Figure 2-3.** Eskişehir-21 greenhouse layout (Annex-M - Greenhouse Layout)

The parcels and conditions of the Project site, Eskişehir-20 and Eskişehir-21 greenhouse areas are summarised in the table below.

Table 2-3. Land Plot-Parcel Information

	Settlement	Plot, Parcel	Land Type	Ownership Prior to Land Acquisition
Parcels of land acquired for the project	Mahmudiye/İsmetpaşa	117 plot, 25, 31, 44, 45, 46, 78, 86, 88, 94, 95, 96, 54, 87 and 90 parcel	Field	Individual
		121 plot, 13, 20, 21, 22, 23, 24, 28, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43 parcel		
		122 plot, 9, 10, 11, 12, 13, 14, 15, 16 and 17, 18 parcel		
		125 plot, 7, 9, 10, 13 and 15, 17 parcel		
		126 plot, 1, 2, 3 and 4 parcel		
		127 plot 1, 4,5 and 6 parcel		
		128 plot 23 parcel		
		130 plot 3 and 4 parcel		
		165 plot 1 parcel		
Lands where Eskişehir-21 Greenhouse will be established	Mahmudiye/İsmetpaşa	121 plot, 21 and 22 parcel	Field	Individual
		122 plot, 10, 11, 12, 13, 14, 15, 16, 17 and 18 parcel		
		126 plot, 1, 2, 3 and 4 parcel		
		127 plot 1 parcel		
Lands where Eskişehir-20 Greenhouse will be established	Mahmudiye/İsmetpaşa	131 plot 1 , 132 plot 1 and 2 parcels	Field	Individual
First determined Drilling Areas (Well coordinates may change after the studies to be carried out)	Mahmudiye/İsmetpaşa	126 plot 1 parcel (M6-25), 127 plot 1 parcel (M5-25), 117 plot 31 parcel (M1), 127 plot 4 parcel, 132 plot 2 parcel (M9), 121 plot 37 parcel (M5), 121 plot 28 parcel, 121 plot 28 parcel (M8), 130 plot 3 parcel (M3-25), 121 plot 40 parcel (M1-25), 121 plot 43 parcel (M2-25), 129 plot 3 parcel	Field	Individual

2.2 Area of Influence

The Area of Influence (Aol) is an important element in the assessment of the environmental and social impacts of a proposed project, as it provides information on the physical and/or social dimension against which the assessment should be made. According to the definition given in IFC PS 1, the Area of Influence includes:

- (i) the project² and activities and facilities within the scope of the project³ that are directly owned, operated or managed by the client (including contractors), (ii) impacts caused by foreseeable developments that are not planned but may occur at a later date or in a different location due to the project, or (iii) indirect impacts of the project on biodiversity or ecosystem services that constitute the livelihood of Affected Communities.
- Project-related facilities not financed under the project, which would not have been constructed or extended in the absence of the project, but without which it is not possible to realise the project.⁴
- Gradual impacts on the area or resources directly used or affected by the project and cumulative/aggregate impacts resulting from existing, planned or reasonably identified developments in the process of identifying risks and impacts.⁵

The impact area for the Project has been determined separately for environmental and social impacts.

Area of Influence for Environmental Impacts

In determining the Area of Influence (Aol), issues such as air pollutant emissions, which are expected to affect a wider area than the Project's impacts on noise, surface water and soil quality, have been taken into account. In this context, an initial area of 500 metres from the Project boundary has been selected to cover a wide range of environmental assessment activities. This defined area can be further expanded, if necessary, to assess relevant facilities and cumulative impacts.

Area of Influence for Social Impacts

The Aol for social impacts has been determined by considering transport activities during the construction of the Project, recruitment of workers, noise and dust generation during the construction and operation of the Project, and air quality impacts related to construction activities. At this phase, an area covering 1 (one) neighbourhood was selected as the priority

² For example, project locations, the project's air belt, water separation line or transport corridors.

³ For example, power transmission corridors, pipelines, pipelines, canals, tunnels, diversions and access roads, borrow areas, waste sites, construction camps and contaminated land (e.g. soil, groundwater, surface water and sediments).

⁴ Associated facilities may include railways, roads, independent power plant, power transmission lines, pipelines, utilities (e.g. electricity, water, natural gas, etc.), warehouses and logistics terminals.

⁵ Cumulative impacts are impacts that are recognised as significant based on scientific concerns and/or the concerns of Affected Communities. For example: cascading impact of gas emissions on the air belt; reduction in water flow due to multiple water withdrawals from the water dividing line; increase in sediment load at the water dividing line, interference with migration routes or movements of wild animals; increase in traffic on roads used by communities or increase in accidents due to increased traffic.

social impact area. The closest settlement to the wells and the project area is İsmetpaşa Neighbourhood. The closest well to İsmetpaşa Neighbourhood is 2.2 kilometres away and the farthest well is 3.5 kilometres away.

In addition, there are two stock farms 200 and 700 meters away from the areas where land acquisition has been completed in the project, namely 121 plot 33,34,35 parcels. In addition, the first planned locations of the 3 wells are located within these parcels. These areas were also taken into consideration when assessing the project impacts.

In general, it is foreseen that the employees will stay in Eskişehir province. However, due to the nature of drilling for geothermal resources, there will be areas where the drilling team will be accommodated at each drilling point. During the construction of the greenhouses, it is envisaged that workers will generally stay in Eskişehir or nearby districts. However, accommodation will be provided in the camp site for non-local workers.

2.3 Associated Facilities

When the World Bank defines associated facilities, it refers to facilities that are not included in the project financing, that will be realised simultaneously, that are necessary for the project to be viable, and that would not have been constructed without the project.

World Bank definition: "Associated Facilities are those facilities that are not financed as part of the project and which, at the Bank's discretion: (a) are directly and substantially related to the project; (b) are carried out or planned to be carried out concurrently with the project; and (c) are necessary for the project to be viable and would not have been constructed, expanded or carried out but for the project. Facilities or activities must fulfil all three criteria to be an Associated Facility."

Since there are no components included in these definitions, there is no associated facility in the project.

3 LEGISLATION REQUIREMENTS

This section outlines how the Project will organise stakeholder engagement activities under national and international requirements.

3.1 Turkish Legislation

Environmental Law No. 2872, published in the Official Gazette No. 18132 dated 11 August 1983 and amended in the Official Gazette dated 29 May 2013 (by Law No. 6486), constitutes the basic legal framework of Turkey's environmental legislation and is supported by numerous regulations. Article 10 of the Environmental Law is the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 31907 dated 29 July 2022.

The Project is included in the Annex-2 list according to the EIA Regulation and a Project Description File has been prepared for the Project in accordance with Article 15 of the EIA Regulation.

Table 3-1. Specific Objectives of the Turkish National EIA Regulation

<p>(1) In order to inform the public about the investment and to receive their opinions and suggestions regarding the project, a Public Participation Meeting shall be held on the date determined by the Ministry with the participation of the institutions/organisations qualified by the Ministry and the project owner at a central place and time determined by the Governorship where the relevant public, which is expected to be most affected by the project, can easily reach.</p> <p>a) The institutions/organisations qualified by the Ministry shall have an announcement stating the date, time, place and subject of the meeting published at least ten (10) calendar days before the date of the meeting in a local periodical published in the region where the project will be carried out and in a newspaper defined as a widespread periodical.</p> <p>b) The Public Participation Meeting shall be held under the chairmanship of the Provincial Director of Environment and Urbanisation or an official to be appointed by the director. In the meeting; the public is informed about the project and their opinions, questions and suggestions are received. The chairman may ask the participants to submit their opinions in writing. The minutes of the meeting shall be sent to the Ministry with a copy to be kept by the Governorship.</p> <p>(2) The Governorate shall announce to the public the timing schedule and contact information regarding the Public Participation Meeting and the process where the public can submit their opinions and suggestions. The opinions and suggestions of the public shall be submitted to the Commission within the timing schedule.</p> <p>(3) Members of the Commission may inspect the project implementation site prior to scoping and may attend the Public Participation Meeting according to the date notified to them.</p> <p>(4) Activities such as distributing brochures, surveys, seminars, etc. to inform the public by the institutions/organisations qualified by the Ministry may be carried out before the Public Participation Meeting or may be published on the website.</p>

The Project Owner is obliged to comply with the following laws as well as environmental laws:

- Labour Law No. 4857, Official Gazette No. 25134 dated 10 June 2003,
- Law on the Exercise of the Right to Petition No. 3071, Official Gazette No. 18571, dated 10 November 1984,
- Right to Information Law No. 4982, Official Gazette No. 25269 and dated 24 October 1984,

- Law on Protection of Personal Data No. 6698, Official Gazette No. 29677 dated 7 April 2016.

3.2 International Standards

TSKB expects borrower organisations to ensure that their Projects comply with National Environmental, Health and Safety (EHS) Guidelines as well as good international practices, including World Bank (WB) Safeguard Policies, EHS Guidelines and best practice documents.

3.2.1 World Bank (WB) Safeguard Policies

World Bank manages projects and activities with Conservation Policies to ensure that they are carried out in an environmentally, financially, and socially sound manner. Conservation Policies include Environmental Assessments and other policies that define the environmental and social negative impacts of projects as well as their mitigation and prevention. These policies are expanded in the “World Bank Operations Manual”, which also provides guidance on the Operational Policies (OP) and composition.

The main objectives and tasks of the World Bank Safeguard Policies for the Project are described below:

OP 4.01 Main objectives and tasks of Environmental Assessment:

- To ensure that the projects proposed for bank financing are environmentally and socially valid and sustainable,
- Informing decision makers about the nature of environmental and social risks,
- To increase transparency and participation of decision makers in the decision-making process.

Under the WB O.P. 4.01, projects are classified under categories A, B or C according to the degree of their potential impact on the environment:

Category A projects: Projects with impacts that could potentially result in significant and diverse environmental and/or social impacts and problems in the future and that are not easily detected at the time of classification,

Category B projects: Projects whose environmental and/or social impacts are site-specific and/or have easily detectable and preventable impacts.

Category C projects: Projects with minimal or no environmental and social impacts.

FI projects: Financial intermediation activities.

An Environmental and Social Management Plan (ESMP) is required to be prepared by the Project Owner for the investments identified and outlined within the scope of this Project and in accordance with the Operational Policies (OP) of the World Bank.

During the preparation of the ESMP, the operational policies listed above were determined, taking into account the scope of the project and the geographical, natural and demographic structure of the region. As a result of the assessment, the project category is assessed as B.

OP 4.04: Main objectives and tasks of Natural Habitats:

- To conserve natural habitats and their biodiversity
- To avoid significant conversion/degradation of critical natural habitats
- To ensure the sustainability of services and products provided to human society by natural habitats.

OP 4.11 Main objectives and tasks of Physical Cultural Resources:

- To ensure the identification and protection of Physical Cultural Resources (PCR), including archaeological and historical sites, historic urban areas, sacred sites, graveyards, burial sites and unique natural values
- To ensure the compliance with national legislation regarding the protection of physical cultural property

OP 4.12 Main objectives and tasks of Involuntary Resettlement:

- To avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs.
- To assist displaced person in improving their former living standards; it encourages community participation in planning and implementing resettlement.
- To provide assistance to affected people, regardless of the legality of title of land.

3.2.2 International Agreements

Turkey is a signatory to many international agreements, including the:

- Stockholm Convention on Organic Pollutants.
- Convention on Long-range Trans-Boundary Air Pollution (CRLTAP).
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade.
- Basel Convention on the Control of Trans-boundary Movements of Hazardous Wastes and their Disposal.
- Kyoto Protocol regarding to the United Nations Framework Convention on Climate Change.

- Montreal Protocol on Substances that Deplete the Ozone Layer.
- Convention on the Conservation of European Wildlife and Natural Habitats
- Convention on International Trade in Endangered Species of Wild Fauna and Flora
- Vienna Convention for the Protection of the Ozone Layer.
- The Protocol on Environmental Protection to the Antarctic Treaty.

Paris Agreement

The Paris Agreement sets out a global framework to avoid dangerous climate change by limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C. It also aims to strengthen countries' ability to deal with the impacts of climate change and support them in their efforts.

The Paris Agreement is the first-ever universal, legally binding global climate change agreement, adopted at the Paris climate conference in December 2015. The EU and its Member States are among the close to 190 Parties to the Paris Agreement. The EU formally ratified the agreement on 5 October 2016, thus enabling its entry into force on 4 November 2016. For the agreement to enter into force, at least 55 countries representing at least 55% of global emissions had to deposit their instruments of ratification.

The Agreement entered into force in Turkey by being published in the Official Gazette dated 07.09.2021 and numbered 31621.

3.2 Gaps between Turkish Legislation and International Directives

Turkish EIA procedures are in line with World Bank Policies, with some exceptions. The main exceptions are project categorisation, scope of environmental and social impact assessment, land acquisition and resettlement issues, and public consultation. Where Turkish legislation differs from WB Policies, the more stringent rules will be applied in project implementation.

4 DUTIES AND RESPONSIBILITIES

All environmental and social commitments described in the Environmental and Social Management Plan (ESMP) will be fulfilled by the Project Owner. Project Management will ensure that all affected parties are informed about the Project, in particular affected settlements, local communities, neighbouring facilities and surrounding government agencies. These groups will be involved in the identification of key issues within the Project.

The Project Owner, in co-operation with relevant third parties, will establish, maintain and strengthen a Project-specific structure defining roles, responsibilities and authority for the implementation of the ESMP and SEP, as required. Dedicated personnel with clear lines of responsibility and authority, including management representatives, should be assigned to the Project. The Project-specific organisational structure will include managers providing coordination and management of the Project, technical and financial experts for the construction and operation phases of the Project, at least one Public Liaison Officer, at least one Environmental Expert and an Occupational Health and Safety Expert (OHS). Key environmental and social responsibilities will be well defined and communicated to relevant staff and the rest of the Project Organisation. Staff should also have sufficient knowledge, skills and experience to competently and efficiently carry out the specific measures and actions required under the ESMP.

The project owner has recruited personnel to manage environmental, social and occupational health and safety issues to fulfil the following responsibilities within its own organisation.

The overall organisational structure for the implementation of the ESMP and SEP is presented in **Table 4-1**.

Table 4-1. General Organisation Structure for the Implementation of ESMP and SEP

Responsible	Duties
<i>Project Owner</i>	<ul style="list-style-type: none"> • General responsibility for implementation, • To ensure that the Project complies with the requirements of International Financial Institutions as described in the ESMP and SEP, • Ensure implementation of ESMP and SEP requirements to minimise environmental and social impacts, • To carry out the monitoring process related to the implementation of ESMP and SEP, • To prepare quarterly environmental and social monitoring reports during the construction period and semi-annual environmental and social monitoring reports during the operation period to be submitted to the lending institutions.
<i>Community Liaison Officer</i>	<ul style="list-style-type: none"> • Ensure that all employees attend training sessions related to the ESMP SEP, keeping records of the conduct of training and awareness sessions for staff to ensure compliance with the environmental, social and safety commitments set out in the ESMP, • To prepare -quarterly in construction period and semi-annually in operation period- environmental and social monitoring reports to be submitted to the Lenders,

Responsible	Duties
	<ul style="list-style-type: none"> To carry out the monitoring process related to the implementation of ESMP and SEP, To adopt and implement the Stakeholder Engagement Plan, Manage the employee and public grievance mechanism. Establish and implement the grievance mechanism system to ensure that it is in line with project guidelines and best practices. Facilitate effective communication channels for stakeholders to express their grievances by providing clear information on the existence of the mechanism and its procedures, Keep comprehensive records of complaints, including details of the parties involved, the nature of the complaints and the steps taken to resolve them, Conduct impartial and thorough investigations into complaints, collaborating with relevant project teams and stakeholders to gather information and assess the validity of concerns, Develop and recommend appropriate solutions or actions to address grievances, aiming for fair and satisfactory resolutions. Prepare regular reports outlining the status of grievances, trends, outcomes and suggested improvements to the grievance mechanism. A grievance mechanism open to employees and the public will be established, a Community Liaison Officer will be appointed, and the mechanism will be introduced to the Project employees. The complaint mechanism and authorized contact information will be introduced on the website at the İsmetpaşa neighborhood headman's office. Train project staff and stakeholders on the grievance mechanism to ensure awareness and understanding of the process. Continuously evaluate and improve the grievance mechanism based on feedback and lessons learnt, fostering an environment of continuous improvement. Ensure that the grievance mechanism complies with legal and regulatory requirements as well as industry standards and project policies. Engage with various stakeholders including local communities, government bodies and project partners to foster positive relationships and proactively address concerns. All employees will be trained on discrimination and codes of conduct. The training to be provided to employees will be explanatory on the concepts of sexual harassment and abuse, gender-based violence, abuse and harassment response. At the same time, through the training, employees will be provided with the Project's Grievance Mechanism (explained in detail in the Project's SEP) and the steps to follow when exercising their legal rights. Access to the Grievance Mechanism will be easy and effective. The Community Liaison Officer assigned for the Project will be announced to all employees during the trainings to be given before starting work. Brochures and posters containing the grievance redress mechanism and the contact information of the authorized person will be placed in places such as cafeterias, canteens and service areas used by employees.
Human Resources Specialist	<ul style="list-style-type: none"> To carry out the recruitment processes of project personnel, Organising training and development programmes for employees, To carry out studies to improve the working conditions of employees and increase job satisfaction within the scope of the project, To manage the personal rights and payroll transactions of employees, Organising activities to increase communication and cooperation among employees,

Responsible	Duties
	<ul style="list-style-type: none"> Carrying out the performance evaluation processes of employees and creating development plans, To plan and implement relevant occupational health and safety trainings.
Environmental Officer	<ul style="list-style-type: none"> Oversee and monitor compliance with and implementation of the ESMP to ensure the establishment and proper functioning of the environmental management system, Ensure that the technical specifications of the project adequately reflect the recommendations given in the ESMP, Regularly visit and inspect the Project area to determine the level of compliance of the works and provide feedback on environmental issues, To prepare quarterly environmental and social monitoring reports during the construction period and semi-annual environmental and social monitoring reports during the operation period to be submitted to the Lenders, Report regularly to the Project Company management on all environmental and social requirements during construction and operation.
Occupational Health and Safety Officer	<ul style="list-style-type: none"> To ensure the establishment and proper functioning of occupational health and safety management systems, To ensure compliance with all regulations related to OHS, Conducting regular inspections in the project area and providing feedback on OHS issues, Organising training and awareness sessions on OHS, Prepare OHS related reports and report regularly to the Project Company management.
Quality Management Systems Unit	<ul style="list-style-type: none"> Planning of the work to be done within the scope of environmental legislation, To provide environmental awareness and waste management trainings to employees, To make contracts with recycling and disposal companies, Ensuring the delivery of wastes to licensed companies, Ensuring operational controls, Evaluating environmental risks and opportunities, carrying out studies to reduce waste.
Project Staff	<ul style="list-style-type: none"> To be informed about environmental and social obligations within the scope of ESMP and SEP and to participate in orientation trainings to fulfil these obligations. To apply what they have learnt in trainings in their daily work, to act in accordance with environmental and social management plans.
Contractor	<ul style="list-style-type: none"> Preparing monthly reports within the scope of environmental and social monitoring studies and presenting them to the project owner.

5 LABOR AND WORKING CONDITIONS

The impact assessment of this section has been considered together for both the construction and operation phases, as potential impacts in both phases may yield similar results; therefore, the same impact mitigation measures will be applied to both phases of the Project.

The general purpose of this labor assessment is to identify significant labor issues and evaluate the Project's existing human resources policies and procedures. The Project Owner WB OPs must take reasonable measures to monitor labor and working conditions in accordance with the International Labour Organization (ILO) fundamental standards and the Turkish Labour Law (Law No. 4857). Employees who previously worked under Nata Tarım and currently work under the project owner are subject to the same standards.

Including management representatives, personnel with clearly defined responsibilities and authority limits should be assigned specifically for the project. Within the project-specific organizational structure to be established, there will be managers responsible for the coordination and management of the project, technical and financial experts who will work during the construction and operation phases of the project, at least one Social Expert, at least one Human Resources Expert, and an Occupational Health and Safety Expert (OHS). Basic environmental and social responsibilities should be well-defined and communicated to the relevant personnel. Personnel must also possess sufficient knowledge, skills, and experience to carry out the specific measures and actions required under the ESMP competently and efficiently.

In the internal audit of construction works and operational activities, personnel assigned from the Project Owner's central organization will regularly conduct audits and inspections.

The Project Owner has not yet contracted with a Contractor for the construction phase, and all Contractors involved in the construction and operation phases of the Project must act in accordance with the commitments and standards provided under EDDD, ESMP, and SEP.

The Project Owner does not have a written subcontractor management plan, and a subcontractor management plan will be prepared before an agreement is made with the contractor. The compliance of contractors with the standards specified in the EDDD, ESMP, and SEP will be guaranteed by the subcontractor agreement.

The project owner has a written Human Resources Policy. The policy provides information about the Project Owner's work process and the legal rights of employees. The Human Resources Policy is presented in Annex-H.

The Project Owner has prepared employee contracts that include the legal rights and responsibilities of the employees; examples of employee contracts for white-collar and blue-collar workers are provided in Annex-I. All personnel (including subcontractors) who will be involved during the construction and operation periods will be employed under contract, and

salary and overtime payments will be made accordingly. A copy of the contract will be shared with the employee, and all legal rights and responsibilities will be explained in detail to the employee before the contract is signed. All employees will be hired as insured, and the insurance will commence from the start date of employment. In the case of foreign national employees, the Project Owner will strictly monitor work permits.

The Project Owner will provide Personal Protective Equipment (PPE) including masks, earplugs, and clothing to employees in accordance with the job requirements. Employees will not be on-site without the necessary protective equipment. In the event that the provided equipment and clothing wear out or lose their adequacy, the Project Owner is responsible for providing new ones.

In accordance with the Occupational Health and Safety Law No. 6331 and the Regulation on the “Communiqué on the Qualifications and Selection Procedures and Principles of the Employee Representative related to Occupational Health and Safety”, published under it, workplaces with 2 to 50 employees should have one employee representative, those with 51 to 100 employees should have two, and those with 101 to 500 employees should have three employee representatives elected and appointed. The Project Owner should organize the election of employee representatives during the construction and operation periods and encourage employees to become representatives. The employee representative should be introduced to the employees through training programs and announcements. The employee representative should be provided with an appropriate environment and tools to hold meetings and conduct regular consultations. The absence of female individuals among employee representatives can lead to a culture of silence in the workplace. Female employees should be encouraged to become representatives, and necessary training programs should be provided for participation in such representation and managerial processes.

There is a Code of Conduct (CoC) policy prepared by the project owner, which is presented in Annex-I. The CoC policy emphasizes that union membership is not an obstacle. It guarantees that harassment and bullying will not be tolerated. It has been explicitly guaranteed that issues such as discrimination, child labor, and forced labor will not be present within the CoC. The CoC policy will be shared with employees as an annex to their employment contracts and will be explained verbally.

The Project Owner is obliged to provide behavior rules training to every employee (including subcontractors) to ensure that personnel working during construction do not cause any disturbance/conflict in local communities and that their interactions with community members do not lead to inappropriate behavior/misconduct. The Code of Conduct training will provide information on Gender-Based Violence (GBV), Sexual Harassment (SH) / Sexual Exploitation, and Abuse (SEA).

Monitoring activities for the implementation of the mitigation measures and commitments given in the ESMP during the project will be carried out by the project owner and the appointed

independent consultant. Contractors will prepare and submit monthly monitoring reports to the project owner. The project owner and the independent consultant will submit monitoring reports to the lending institution every 3 months during the construction period and every 6 months during the operation period.

Currently, construction works have not started. The project is in the planning and design phase. Drilling works and greenhouse construction works are expected to start in 2025 and be completed in 2026. The project is expected to create temporary employment during the construction period. During the construction period, priority will be given to contributing to the local economy by using local materials and sourcing various goods and services locally.

While conducting recruitments, the local community will be informed about employment opportunities. Informative brochures left at neighborhood head offices can play a key role in this process. The Project Owner will inform its stakeholders about employment and procurement opportunities. It is important that the recruitment process is conducted transparently and that equal opportunities are provided to all applicants.

The drilling works to be carried out will be carried out 12 months a year, 25 days, 8 hours a day (single shift) according to seasonal conditions and it is planned to employ 21 people in each well during the activities. Although there is no exact information on the number of personnel to be employed during the construction period, approximately 750 people are expected to work. During the operation period, an average of 900 people are planned to be employed by the Project owner.

The Project Owner will prioritize local employment during the operational period, taking into account the provision of the necessary skills and competencies. The proportion of women working within Alarko Tarım, the main structure to which the Project Owner is affiliated, is 71%, and the Project Owner aims to ensure that 90% of the personnel working during the operational period of this project are women.

The project owner also aims to establish a nursery, an academy building for training technical personnel, and social facilities in order to facilitate the working conditions of female employees in the project area.

During the construction period of the project, a campsite will be established in the project area for the accommodation of the personnel. The camp area is planned to be set up by the contractor who will be involved during the construction period. The Project Owner will be responsible for ensuring the supervision of the camp area and for ensuring that the camp area meets the worker accommodation standards⁶ prepared by the IFC and EBRD and approved by the World Bank. The camp area will include rest areas for employees, a cafeteria, and sanitary facilities that meet hygiene standards. The Project Owner will prepare a Camp Management Plan to ensure the management and supervision of the camp area and to ensure

⁶ <https://documents1.worldbank.org/curated/en/604561468170043490/pdf/602530WP0worke10Box358316B01PUBLIC1.pdf>

its establishment in accordance with the relevant international standards. The camp management plan should be prepared before a contract is made with the contractor who will be involved during the construction period.

It is planned to provide transportation services for the personnel who will work during the operational period by the project owner. The contractor company will be responsible for the transportation of the personnel during the construction period. To ensure the comfort and safety of the employees, the shuttles will be made suitable for safe transportation. The number of services will be determined according to the number of personnel. The Project Owner will guarantee these matters through the contractor agreement.

The project area will be designed to include separate prayer rooms for male and female staff to enable them to perform their religious duties.

Changing rooms with appropriate ventilation systems that meet hygiene standards will be provided for female and male staff.

During the construction and operation periods, security personnel will be present on site. Security personnel should be trained on proper communication methods with employees and local communities.

6 SOCIAL BASELINE OF THE PROJECT

In this section, quantitative and qualitative data have been compiled for the social baseline of the Project. The purpose of the socio-economic baseline study is to identify the socio-economic conditions and trends in areas potentially affected by the Project in order to understand potential impacts and develop appropriate mitigation measures. The socio-economic baseline defines the significant socio-economic issues of provincial and local communities and creates a socio-economic database that can be used to monitor changes occurring in the affected communities after the Project.

To see the Project Area, identify sensitive recipients, and determine whether there are official/unofficial users on the land, the first field visit was conducted on 16 February 2024. During the site visit, a meeting was held with the Project Owner, and a preliminary discussion was conducted at the Project site with the headman of the nearest settlement, the İsmetpaşa neighborhood. After the initial meetings, a second site visit was conducted on 29 February 2024, to inspect the wellhead locations. A third site visit was made on 30 July 2024 for interviews with the former owners of the lands and re-evaluation of the site.

The social area of influence of the project has been determined by considering land acquisition, workers accommodation, noise during construction and operation phases, workforce flow, changes in dust and air quality, and traffic-related impacts, with the nearest settlement being the İsmetpaşa neighborhood, located 1.5 km from the project area. During the life of the project, the impact area can be expanded by experts in line with complaints from stakeholders.

Primary data regarding the communities living around the project area and the potential project impacts were obtained through an informative interview with the headman of the İsmetpaşa neighborhood.

The only settlement close to the drilling and greenhouse areas is İsmetpaşa Neighborhood of Mahmudiye District of Eskişehir Province. Although İsmetpaşa Neighborhood is the only settlement in the Project impact area, there are two fattening farms 200 and 700 meters away from parcels 121, block 33, 34, 35, where land acquisition has been completed.

Heavy vehicles and materials may pass through during the Project construction works. Since the employees will be accommodated in the camping area, no traffic density is expected due to shuttles. The number of shuttles during the operation period has not been clarified and updated information will be reflected in the SEP. However, it is foreseen that the traffic load will increase with activities such as transportation of employees, transportation and parts transportation.

Secondary data plays an important role in understanding the socio-economic current situation and potential social risks and impacts. The information obtained from secondary data enhances the quality of the current situation studies. These data have been collected and prepared through regional and national statistics and project documents.

The project owner continues to purchase land for the construction of greenhouses, production and reinjection wells. For this reason, it is not yet clear which of the purchased lands will be used for greenhouses and which for wells. Considering the newly purchased lands, cattle are being raised in two fattening farms identified as two sensitive receptors close to the project area, and a full impact assessment will be possible after it is clear which activity will be carried out on the land they are close to. However, fattening farms may be exposed to the following impacts during the construction period:

Noise and Vibration:

- Increased noise and vibration from construction activities can disturb animals and cause stress. This situation can lead to a decrease in milk production or a slowdown in the rate at which animals gain weight, resulting in reduced productivity.
- Decreased productivity can lead to financial losses on farms due to both low production and increased treatment costs for animals experiencing health issues caused by stress.

Dust and Air Quality:

- Dust from construction activities can contaminate animal feed and water sources, which can negatively affect the health of the animals.
- If the feed and water sources are contaminated, farms may have to take protective measures or provide clean sources, which can increase operating costs.

Traffic and Access:

- An increase in construction traffic can make it difficult to access farms and prevent feed, materials, or veterinary services from reaching the farms.
- Delays caused by traffic or disruptions can prevent timely procurement of resources, which can affect farm operations and increase costs.

Water Use and Pollution Risks:

- Construction can increase the risk of pollution to local water sources that are critical for animals. Water scarcity or pollution can have negative effects on animal health.
- Farms may have to find alternative water sources, leading to additional costs. Additionally, water quality issues can affect animal health, productivity, and market value.

The greenhouse and wells will not have a significant impact on the stock farms during the operational periods. However, it can be observed that the traffic density on the roads near the stock farms may increase due to the shuttles used by the greenhouse workers for their commutes. Additionally, it is planned for the project owner to work in collaboration with the municipality to invest in sewage infrastructure in the area. If this investment is realized,

sensitive recipients and stakeholders affected by the project will also be able to benefit from this service.

For the potential impacts of the project mentioned above, the following measures should be taken to minimize negative effects:

- Dust suppression techniques and noise barriers should be implemented during construction.
- Regular monitoring of water sources is important to prevent any pollution.
- Construction should be planned in a way that does not obstruct access to farms.
- By ensuring early and continuous communication with farm owners, their concerns should be addressed, and potential compensation mechanisms should be established.

6.1 Cultural Heritage

The activities to be carried out within the scope of the project will be conducted within the Environmental Impact Assessment (EIA) areas, and these areas are located on agricultural lands. In order to evaluate the baseline of the project area and its surroundings in terms of cultural heritage, an opinion letter was obtained from the Eskişehir Regional Board for the Protection of Cultural Heritage before starting the land preparation activities. As a result of the evaluations conducted, no cultural heritage or archaeological artifacts were identified. In the event that any archaeological remains or artifacts are found during the construction, all activities will be halted, and the Museum Directorate will be informed in accordance with Article 4 of Law No. 2863. The artifacts found during the construction works will be specified and recorded as "accidental finds." A "Chance Find Procedure" will be prepared before the commencement of construction works to explain the steps to be followed and implemented after a chance find. Correspondence on this matter will be updated considering all decisions made, and all documents will be presented in the ESMP's annex.

6.2 Traffic and Transportation

The 2023 Regional Directorate State Roads Volume Map of the General Directorate of Highways-Ministry of Transport and Infrastructure is presented in **Figure 6-1** of the traffic volume maps.

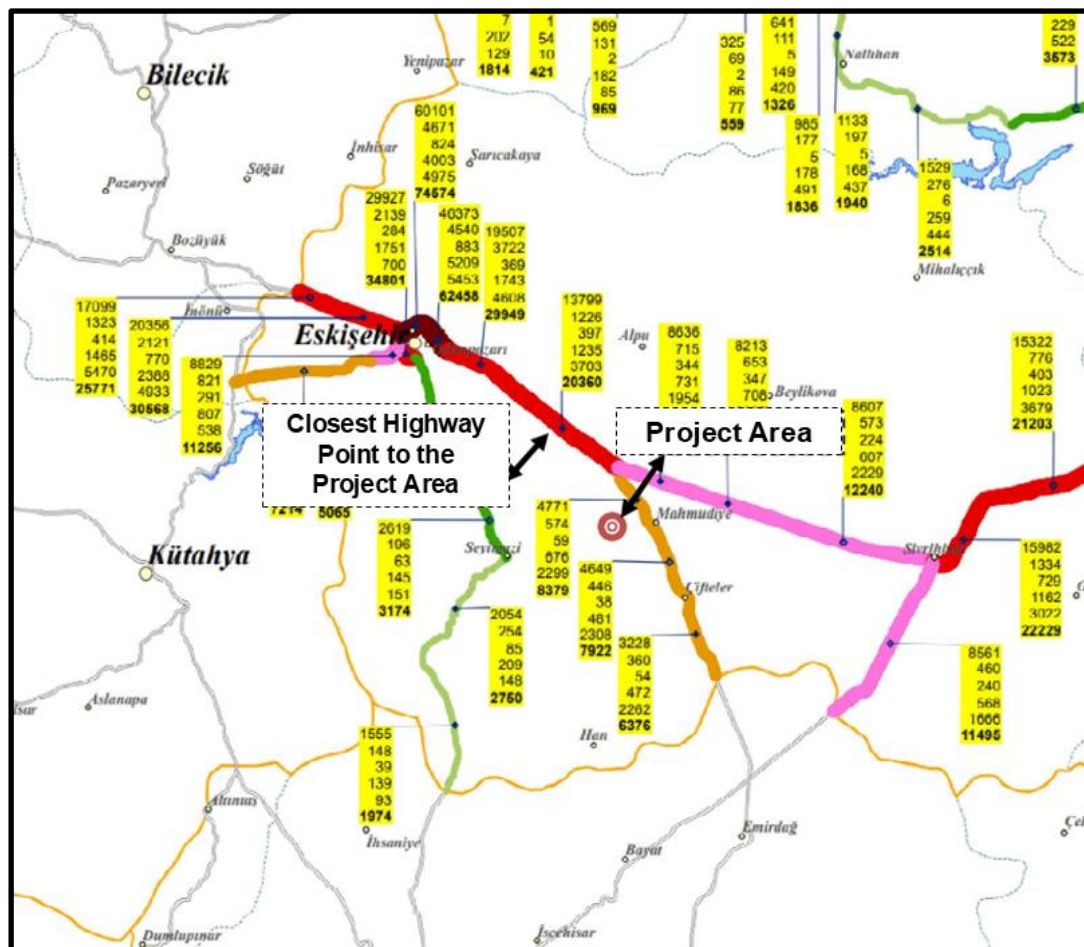
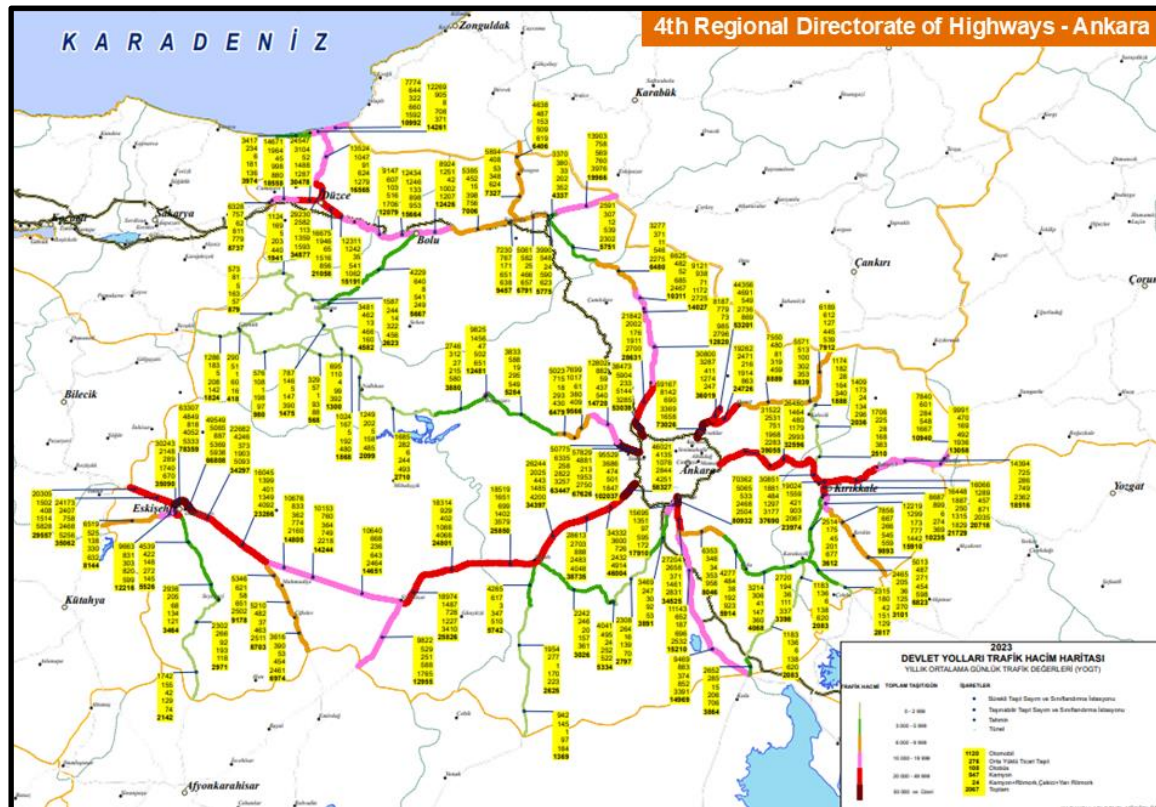


Figure 6-1. 4th Regional Directorate State Roads Volume Map

To the southwest of the activity area, the Ankara-Eskişehir Highway (E90) is located approximately 9 km away.

Table 6-1. Traffic Volume Map - Vehicle Passage

Vehicle Type	Number of Vehicles
Automobile	4649
Medium Commercial Vehicle	446
Bus	38
Truck	481
Truck, Trailer, Wrecker, Semi-Trailer	2308
Total	7922

During the construction works to be carried out within the scope of the Project, there may be heavy vehicle passage and material passage. As Project personnel will be accommodated in the camping area in the Project area, no heavy traffic is expected to be generated by shuttles.

Although the number of shuttles to be used during the operation period of the Project has not yet been finalized, it will be reflected in the SEP if updated information is available. Considering the activities such as departures and returns of employees, transportation and parts transportation during the operation period, it is thought that the traffic load in the region will increase.

For vehicle passages, times with low traffic density should be preferred, and necessary warning signs should be placed on special access roads. Personnel operating vehicles and machinery will be specially assigned and will receive traffic and road safety training. The maintenance of construction machinery and equipment will be carried out regularly, and regulatory speed limits for construction vehicles will be adhered to.

A Traffic Management Plan has been prepared within the Project Description File of the project. The Traffic Management Plan will be updated and shared with the contractor before the construction work begins, once the design phase of the project reaches its final stage. As required by the traffic management plan, all necessary signs, barriers, and control devices will be installed to ensure the safe use of the road by traffic and pedestrians.

Any damage that may occur on the surfaces of existing roads used during construction works due to heavy machinery will be repaired by the contractor. In the event that any damage occurs to the infrastructure elements on private lands due to construction activities, mitigating measures will be taken by the contractor. The Project Owner is responsible for ensuring that the contractors take corrective actions.

6.3 Demography and Population

The project will be conducted in the İsmetpaşa Neighborhood of the Mahmudiye District, Eskişehir Province. According to the 2023 data obtained from the address-based population registration system, the population of Eskişehir Province consists of a total of 915,418 people, with 454,606 men and 460,812 women. According to the 2023 data, the population of Mahmudiye district is 7,715, consisting of 3,999 men and 3,716 women.

The neighborhood closest to the project area, İsmetpaşa, is presented in **Table 6-2**.

Table 6-2. Population Data of the Projects Area of Influence

Settlement Area	Female	Male	Total Population
İsmetpaşa Neighborhood	549	580	1.129

Reference: TÜİK 2023

In the meeting with the İsmetpaşa neighborhood headman, it was asked whether there are any immigrants and/or refugees in the neighborhood. There are 3-4 Syrian citizens living in the neighborhood who work for animal husbandry. It has been stated that there are no social problems/tensions within the neighborhood.

6.4 Livelihoods and Employment

In the Northwestern Anatolia Region, which includes Eskişehir Province, the Pontids and Anatolids, among Turkey's tectonic communities, are adjacent to each other. Due to its geological and structural characteristics, this region is quite important in terms of both metallic minerals and industrial raw materials. Known as the symbol of the city, sepiolite is a type of ornamental stone found only in the province of Eskişehir in Central Anatolia, Turkey. Known as white gold, sea foam, and Eskişehir stone, nearly all commercially exploitable deposits of sepiolite are located in Eskişehir province (General Directorate of Mineral Research and Exploration (MTA)).

When looking at the sectoral distribution of the workforce in the Eskişehir economy, 52.1% of the population is based in services, 32.4% in industry, and 15.5% in agriculture. In the distribution of the main sectors within the provincial economy, it is observed that the services and industrial sectors stand out (Turkey Employment Agency (İŞKUR)).

The businesses with high employment are Arçelik Inc., TUSAŞ Motor Industry and Trade Inc., Eti Maden Kırka Boron Enterprises, Ford Automotive Industry and Trade Inc., and Eti Food Industry and Trade Inc.

The main types of agricultural products are grains, legumes, sugar beets, sunflowers, fruits, and vegetables. The diversity of agricultural products has also led to the development of agriculture-based industries. Turkey Sugar Refineries Inc. and numerous facilities producing biscuits and baked goods in the city can be given as examples of this.

Another source of livelihood, animal husbandry, is also based on small-scale livestock farming. It is one of the important sources of income for people working in the agricultural sector. In the Mahmudiye and Çifteler districts of Eskişehir Province, small-scale livestock farming is practiced. Additionally, racehorses are bred in the pastures of Mahmudiye District.

In a meeting with the headman of the İsmetpaşa neighborhood, which falls within the projects Area of Influence, information about economic activities was obtained and is presented in **Table 6-3**.

Table 6-3. Common Economic Activities in the Project Area

Settlement Area	First Degree Common Economic Activity	Second Degree Common Economic Activity	Third Degree Common Economic Activity
İsmetpaşa Neighborhood	Animal Husbandry	Agriculture	Service Sector

In the neighborhood, cattle farming is being carried out, with approximately 2,000 large cattle and 4,000-5,000 small cattle. Agricultural activities are carried out for personal production, animal feed production, and sales. The generally produced products are sunflower, clover, and corn. There are no beekeepers or horse breeders. As the neighborhood headman stated, approximately 40-50 women living in the neighborhood work in the greenhouses located nearby.

6.5 Education

According to the Eskişehir Provincial Directorate of National Education, there are 495 schools/institutions, 6,557 classrooms, 11,697 teachers, and 137,811 students within the provincial borders. There are 3 universities in Eskişehir with a total student population of 65,954.

In Mahmudiye district, there are 961 students in primary education and 346 in secondary education, totalling 1307 students and 162 teachers. In primary education, the number of students per classroom is 15, while in secondary education, the number of students per classroom is 22. In the İsmetpaşa neighborhood, there is one elementary school and one middle school.

6.6 Health

In the Mahmudiye district, there is a state hospital and a family health center. There is a health center in the neighborhood, but it is out of use. Neighborhood residents go to the district center to benefit from health services.

6.7 Vulnerable Groups

Currently, the Project area is owned by the Project Owner and there is no cultivated land in the area.

According to the information provided by the İsmetpaşa neighborhood headman, inquiries were made regarding sensitive/disadvantaged individuals/groups, and the identified groups are presented in **Table 6-4**.

Table 6-4. Sensitive/Disadvantaged Individuals/Groups in the Project Area

Settlement Area	Individuals over the age of 65 who live alone	Poor families *	Physically / Mentally disabled people	Women-head households	Refugee households
İsmetpaşa Neighborhood	1 person	5 family	4 person	6 person	4

Reference: Survey Study with the Headman, 2024

* Households dependent on social and economic support are defined as Poor Families by the headman.

These groups have been assessed according to the impacts of the project and it is considered that they will be affected in the following ways:

Individuals over the age of 65 who live alone:

Environmental impacts such as noise and dust caused by construction activities may trigger health problems (breathing difficulties, heart diseases) in elderly individuals.

Since their physical mobility may be limited, they may experience access difficulties due to road closures or infrastructure works.

Mitigations

They will be informed about the changes to be made in the areas where they may be directly or indirectly affected by the project activities. Ease of access and transport will be provided.

Poor Families:

Increased food, housing or other living costs (rents, material prices) during the construction process may increase the economic burden on poor families. Security risks (road closures, accidents) and a decrease in quality of life may be seen in areas close to the construction area.

Mitigations

Temporary and permanent employment opportunities will be created within the scope of the project to support them economically. Considering the economic situation of these families, they will be directed to social support mechanisms.

Physically/mentally Disabled Individuals:

Accessibility to the disabled in and around the construction site may be restricted, making their daily lives difficult. Effects such as noise, vibration or crowding can create stress and anxiety, especially for individuals with intellectual disabilities.

Mitigations

Access points in and around the project area will be made suitable for disabled people. Necessary measures will be taken to minimise the negative impacts of project activities on the disabled.

Female-Headed Households:

Widows experiencing economic hardship may face the risk of disruption to their livelihoods during the construction period.

The social structure and security concerns in the neighborhood may cause widows to feel more insecure.

Mitigations

Special employment opportunities will be created for these groups and their economic empowerment will be ensured. Measures will be taken to ensure their safety during project activities and to prevent any discrimination.

Refugee Households:

They may be excluded from information and participation in the construction process due to language and communication barriers.

Social exclusion or discrimination may increase their vulnerability and lead to deterioration in their living conditions.

Temporary infrastructure disruptions (water, electricity) or impacts on employment opportunities may further strain refugee families economically.

Mitigations

Refugee households will be included in the social orientation programmes to be carried out within the scope of the project. Their economic integration will be supported by providing job opportunities and they will be informed about the negative impacts that may arise from project activities. In addition, cultural sensitivity trainings will be organised to facilitate the integration of refugees with the local community.

6.8 Infrastructure and Services

During the survey conducted with the neighborhood headman, information regarding the existing infrastructure and services was obtained and presented in **Table 6-5**.

Table 6-5. Existing Infrastructure Services in the Project Area

Settlement Area	Water Source	Irrigation Source	Sewer System	Waste Management	Public Transport Vehicle	Cooperative / Association
İsmetpaşa	Network Water	Groundwater	Available	Wastes collects by the Municipality	Minibus, bus	1

Reference: Survey Study with the Headman, 2024

6.9 Land Acquisition

Currently, the land acquisition process for the greenhouse campus has been completed and the ownership of the Project area belongs to Beybur Agriculture and Livestock Inc. It is planned to transfer the shares of Beybur Agriculture and Livestock Inc. to Nata Tarım at a later stage.

During the field trip on 30.07.2024, 6 people out of 20 people who have completed the land acquisition process were interviewed. It was learnt that 4 of the 6 former landowners were the sole owners of the land, while the other two former landowners had partners. In addition to this, all partners have accessed the land prices. Although the interviews with the former landowners had been arranged in advance, the number of interviewees remained at 6 due to the emergency situations of the interviewees on the day of our field trip. All of the lands are located within the borders of İsmetpaşa neighbourhood. The stakeholders who sold the land are the residents of İsmetpaşa neighbourhood. The qualification of all the purchased lands is field. In the interviews with the former landowners and the former headman, it was stated that the land was sold at a price above the market price compared to similarly located and qualified fields. Land prices were received through bank accounts. With the payments received as a result of the sale of the lands, people generally made property investments such as houses or fields. In all interviews, it was determined that there was no negative situation between the company and the land owners during the sale process and that the sale was carried out with a voluntary-seller-voluntary-buyer model.

Stakeholders are informed about the project. However, in order for stakeholders to have more detailed information about the project, the project proponent should organize a consultation meeting by setting a time, date and place that is appropriate to the circumstances of the people affected by the project.

6.10 Level of Knowledge About the Project

According to the information obtained during the interview with the neighborhood headman, the neighborhood residents are aware of the Project. The neighborhood headman was also asked whether he had received any complaints to date. No complaints have been received and no negative perception has been detected.

As a result of the interviews, it was learned that landowners are aware of the Project. Landowners are aware that the land was purchased by Beybur Agriculture and Livestock Inc. for Project Owner.

A public participation meeting was held on 08.01.2025 to provide more detailed information about the project to the groups affected by the project. Detailed information about the meeting is provided in Section 7.2.

7 PROJECT STAKEHOLDERS

A stakeholder is defined as any individual, organisation or group that may be affected by the Project or has an interest in the Project and its impacts. The purpose of stakeholder identification is to determine which stakeholders will be directly or indirectly - positively or negatively - affected ('affected parties') or have an interest in the Project ('other interested parties').

The Project Owner currently maintains communication with official institutions. During the interviews, it was learnt that landowners are informed about the Project.

It is important that particular efforts are made to identify disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project, or who may find it difficult to participate in the engagement and development process. Stakeholder identification is also an ongoing process and will require regular review and updating.

Stakeholder identification is an ongoing process and different issues are likely to be of interest to different stakeholders. Stakeholders have therefore been grouped according to their relevance to the Project. Understanding a stakeholder group's links to the Project helps to define the key objectives of any engagement.

A suitably qualified staff will be authorised to implement the SEP by the Project Owner and will be responsible for stakeholder engagement activities, but the Project Owner has ultimate responsibility for the implementation of the SEP.

Stakeholders interested and affected by the Project are presented in [Table 7-1](#).

Table 7-1. Stakeholder Groups

Stakeholder Groups	Type of Stakeholder	
	Affected Party	Interested Party
Internal Stakeholders		
Subcontractors and Project Owners Employees		√
External Stakeholders		
Local Communities		
• Residents of İsmetpaşa Neighborhood,	√	
State / Authorities		
<ul style="list-style-type: none"> Ministry of Energy and Natural Resources, Ministry of Environment, Urbanization and Climate Change, Ministry of Treasury and Finance, Ministry of Industry and Technology, Ministry of Agriculture and Forestry, Eskişehir Governorship, Eskişehir Provincial Directorate of Environment, Urbanization and Climate Change, Eskişehir Provincial Directorate of Health, 		√

Stakeholder Groups	Type of Stakeholder	
	Affected Party	Interested Party
Creditor		
• TSKB		√
Municipality		
• Eskişehir Metropolitan Municipality	√	√
• Mahmudiye Municipality		
Landowners		
• Landowners for whom the purchase is being carried out	√	
Vulnerable Groups		
<ul style="list-style-type: none"> Households with family members who have physical and/or mental disabilities, Elderly individuals over 65 years old who live alone and are in need of care, Households where women are the head of the family, Households with low or no income, and Refugee households. 	√	
Media		
• Local and National Media	√	

7.1 Stakeholder Engagement Tools

The Project will utilise a range of tools and methods for stakeholder engagement. In order to ensure efficient and effective stakeholder engagement throughout the life of the Project, new mechanisms will be incorporated as deemed appropriate in addition to the already established communication mechanisms.

The methods to be used for communicating with stakeholders are presented below:

- Formal and informal face-to-face meetings (individual and collective) - This includes stakeholder meetings planned by the Project or requested by stakeholders.
- Project Owner Website – public project announcements, documents, reports, etc.
- Grievance Mechanism - specifically targets directly affected stakeholders. The details of the mechanism in question will be clearly introduced to the stakeholders within its scope.
- Media promotions - meeting participation invitations, information sharing, etc.

7.2 Stakeholder Participation Meeting

In order to provide information about the project to be implemented, a stakeholder participation meeting was held at the Village Wedding Hall on 08.01.2025 between 11:00-12:30. The meeting was attended by the Mahmudiye District Mayor and İsmetpaşa Village Headman, some of the prior land owners, TSKB's Environmental and Social Consultant 2U1K official and more than 70 people from the local community.

The officials shared information about the project details, explained the environmental and social impacts, provided information about the employment processes, received the opinions of the public and answered their questions.

The questions, opinions and answers given during the meeting are given below:

- A participant asked about the impact of the use of geothermal water on agricultural production and the sustainability of resources.
 - In response; It was stated that the water to be taken from underground would only be used for heating purposes, would be circulated through the greenhouse with closed system pipelines without going out in any way, and would be re-injected underground after providing heating, and that there would be no negative impact on the sustainability of the source and the water resources used for agricultural purposes, since there would be no contact.
- A different participant stated that 90 percent of the local population consists of citizens of Eastern origin and shared the desire to have an inclusive approach in recruitment. In addition, it was expressed that it is important to provide educational opportunities that provide knowledge and skills for young people.
 - In response, it was stated that priority would be given to the local population in recruitment; a long-term investment targeting regional development was planned. It was also noted that there were educational plans to provide competence.
- During the meeting, Village Headman Mr. Mehmet Keskin took the floor and expressed that the investment in question was important in terms of the employment it would create, educational opportunities, preventing the migration of young people to cities and similar processes; he stated that they were very pleased with Alarko's investment in this regard and that they, as the local people, would provide all the support they could.

The list of meeting participants is provided in Annex-N and meeting photographs are provided in Annex-O.

Following the above-mentioned meeting, the project proponent shared the Environmental and Social Due Diligence Report, Stakeholder Engagement Plan and Environmental and Social Management Monitoring Plan on its website to inform stakeholders. Ten days after the disclosure of the reports, the Community Liaison Officer organised a series of information meetings to provide information about the relevant reports and plans and to listen to stakeholders' views, suggestions and concerns about the project.

The stakeholder meetings were held at İsmetpaşa Merkez Kiraathanesi and Mahmudiye Kiraathanesi, and a private meeting was also held with the Mayor of Mahmudiye Municipality.

In addition, in order to make the grievance mechanism more effective, brochures with the phone number where complaints and suggestions can be submitted were distributed to stakeholders during the meetings.

Photographs of the meetings and the grievance box are given in Annex-S and the prepared brochures are given in Annex-T.

7.3 Future Stakeholder Engagement Activities

Stakeholder engagement will continue throughout the Project's lifespan. Key stakeholders will be informed about the progress of the Project, and they will have the opportunity to provide feedback on the effectiveness of mitigation and improvement measures and to raise their concerns or complaints.

The information to be shared with stakeholders will include, but not be limited to, the following:

- The purpose of the project,
- Impacts and the mitigation or enhancement measures implemented,
- Roles and responsibilities,
- Monitoring and management measures, and
- Information regarding the grievance mechanism for the project.

To ensure effective stakeholder engagement, the following measures should be considered by the Project Owner:

- SEP will be distributed to all affected neighbourhoods and relevant stakeholders.
- SEP and ESMP will be reviewed annually by the Project Owner and updated in case of any changes in the Project, changes in the Grievance Mechanism officer or contact information, and taking into account the complaints and requests received.
- The Project Owner will interact with affected stakeholders and other relevant parties as structured in this Plan.

The expert appointed to ensure Social Compliance of the Project will be responsible for stakeholder engagement as an ongoing process throughout the life of the Project.

8 GRIEVANCE REDRESS MECHANISM

The purpose of the Grievance Redress Mechanism (GRM) is primarily to ensure that people affected by the Project, including affected communities and project staff, have access to a grievance resolution procedure. Grievances can be indicative of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Project staff, local communities and other stakeholders.

The structured GRM ensures that Project-related grievances are addressed through a transparent and impartial process. A worker grievance mechanism will be used for staff who are considered internal stakeholders of the Project and who work directly or indirectly in the Project, and a public grievance mechanism will be used for external stakeholders of the Project.

From the start of the Project, the grievance procedure should be shared with stakeholders through individual or group meetings, printed materials, notice boards, and this process should continue throughout the Projects lifespan.

Grievances will be received by the GRM officer appointed by the Project Owner and the timeframe for response or further investigation will depend mainly on the complexity of the issue raised. Ideally, however, it is expected not to exceed 14 days from receipt of the grievance.

The methods used to publicise the existence of the Grievance Redress Mechanism should be culturally appropriate and in line with general stakeholder information methods. Women and men may access information differently and equal access to information should be ensured for both groups. Stakeholders will be able to share their views and grievances through a range of options such as letters, e-mails, grievance boxes and face-to-face meetings throughout the life of the Project.

All stakeholders submitting a grievance can request that their submission be treated confidentially. The Project Owner will ensure that the name and contact details of the complainant are not disclosed without their consent.

In the event that the Contractor receives a sensitive grievance (cases of Sexual Exploitation and Abuse/Sexual Harassment and Gender-Based Violence), they will be responsible for delivering the matter directly to the Project Company's GRM officer. The Project Company is also responsible for immediately forwarding sensitive grievances to the bank.

The GRM officer who will manage the Grievance Redress Mechanism will be familiar with the guidelines prepared by the World Bank for the prevention of sexual abuse, exploitation and harassment in construction works financed projects. Complaints of gender-based violence, exploitation and harassment can lead to a culture of silence due to negative reactions from the

community. In order to avoid this, it is highly important for stakeholders to submit their grievances on these Project-related issues anonymously. Employee contracts will encourage employees to use the grievance mechanism. In addition, it will be clearly stated in employee contracts and the Human Resources Policy that any grievance raised will not lead to retaliation such as dismissal or punishment. Thus, employees will be protected by their contract with the Project Company when they raise grievances.

The Contractor and the Project Company will receive training on the principles regarding Sexual Exploitation and Abuse/Sexual Harassment and Gender-Based Violence cases and the Project Company is responsible for providing this training to contractor and subcontractor staff.

If stakeholders cannot reach a satisfactory solution through the above-mentioned channels, they will be able to reach the Presidential Communication Centre (CİMER), Foreigners Communication Centre (YİMER) and relevant legal institutions.

Presidential Communication Centre (CİMER):

- CİMER Website (www.cimer.gov.tr),
- CİMER Call Centre (150),
- CİMER Telephone Number: +90 312 525 55 55 - Fax Number: +90 312 473 64 94,
- Mail sent to the Communications Directorate of the Republic of Turkey,
- Individual applications at the public relations desks of governorships, ministries and district governorships.

Foreigners Communication Centre: Foreigners Communication Centre (YİMER), provides a centralised complaint system for foreigners:

- YİMER Website (www.yimer.gov.tr),
- YİMER Call Centre (157),
- YİMER Telephone Number: +90 312 5157 11 22 - Fax Number: +90 312 920 06 09,
- Mail sent to the Communications Directorate of the Republic of Turkey,
- Individual applications at the Directorate General of Migration Management of the Republic of Turkey.

Apart from these, TSKB's grievance channels are as follows:

- TSKB Website (<https://www.tskb.com.tr/hakimizda/iletisim/tbb-musteri-sikayetleri>)
- TSKB Telephone Number (+90 (312) 441 75 22)
- TSKB E-Mail (tskb@hs02.kep.tr)

- Address: Kızılırmak Mahallesi, Dumlupınar Bulvarı No: 9, A Blok, Kat: 12, Kapı No: 517
YDA Center, Çankaya / Ankara

Applicants whose complaints cannot be resolved through the existing grievance redress mechanism or whose complaints involve sensitive issues can always apply to the relevant legal institutions. The Relevant Institutions can be summarised as follows, but not limited to these.

- Civil Courts of First Instance,
- Administrative Court
- Commercial Courts of First Instance
- Labour Courts and;
- Ombudsman (<https://ebasvuru.ombudsman.gov.tr/>).

Examples of the consultation form, public and worker grievance forms and grievance closure form prepared to be used within the scope of the project are given in Annex-1, Annex-2 and Annex-3 respectively.

8.1 Grievance Record

All incoming complaints will be entered into the Grievance Log with a separate reference number. Verbal complaints will also be recorded in the Grievance Log (Annex-4) by the GRM officer.

The Grievance Log will also be used to track the status of the grievance, analyse the frequency of grievances and typical sources and causes of grievances, as well as to identify current topics and recurring trends.

All grievances will be recorded in the relevant Grievance Log with the following information:

- Grievance reference number,
- Date of the grievance,
- Information on where the grievance was received and in what form (related to grievance boxes),
- Grievance's contact information (valid for non-anonymous complaints),
- Content of the grievance,
- Parties responsible for addressing the issue,
- Start and end dates of the grievance investigation,
- Investigation results,

- (For non-anonymous complaints) Information on proposed corrective actions to be sent to the complainant and the date of sending,
- Deadlines for the project team to take necessary measures,
- Indication of whether the corrective action is sufficient or the reason for the grievance not being resolved,
- Closure of the grievance,
- Actions pending in the case of unresolved grievances.

8.2 Grievance Procedure

8.2.1 Worker Grievance Mechanism

The Worker Grievance Mechanism (WGM) is defined as complaints from employees (including both direct and indirect employees).

This mechanism has been structured to ensure an effective approach for the early detection, evaluation, and resolution of complaints throughout the Project's lifespan. The Grievance Mechanism must ensure that all employees who file complaints are not subjected to any retaliation.

The scope of the Worker Grievance Mechanism can be summarized as any worker with concerns related to fieldwork, including but not limited to occupational health and safety, working conditions, wages, issues between the local community or colleagues, hygiene issues in common areas, insufficient food supply, and concerns about employee safety.

The Grievance Mechanism will be communicated to all employees through written and verbal communication channels. Each employee should be informed about the grievance mechanism at the time of hiring, and information on how this mechanism works should be easily accessible, for example, in employee handbooks.

Confidentiality is very important to some employees; therefore, employees may submit grievances and remain anonymous. Employees who wish to submit a grievance anonymously should be allowed to do so. The response or actions taken in response to an anonymous grievance will be posted on notice boards in locations common to Project employees (e.g. cafeteria, dressing rooms, etc.). The Community Liaison Officer (CLO) will open the grievance boxes located in the project area every 5 days and will make an assessment to determine whether the issue raised by the complainant falls within the scope of the Worker Grievance Mechanism.

The duties of the Community Liaison Officer are as follows:

- Ensure that all employees attend training sessions related to the ESMP and SEP Keeping records of the conduct of training and awareness sessions for staff to ensure compliance with the environmental, social and safety commitments set out in the ESMP and SEP,
- To prepare quarterly environmental and social monitoring reports during the construction period and semi-annual environmental and social monitoring reports during the operation period to be submitted to the Lenders,
- Manage the employee and public grievance mechanism.
- Establish and implement the grievance mechanism system to ensure that it is in line with project guidelines and best practices.
- Facilitate effective communication channels for stakeholders to express their grievances by providing clear information on the existence of the mechanism and its procedures,
- Keep comprehensive records of complaints, including details of the parties involved, the nature of the complaints and the steps taken to resolve them,
- Conduct impartial and thorough investigations into complaints, collaborating with relevant project teams and stakeholders to gather information and assess the validity of concerns,
- Prepare regular reports outlining the status of complaints, trends, outcomes and suggested improvements to the grievance mechanism
- To ensure awareness and understanding of the process by training project staff and stakeholders on the grievance mechanism
- Engage with various stakeholders including local communities, government bodies and project partners to foster positive relationships and proactively address concerns.

All employees will be trained on discrimination and code of conduct. The trainings will be explanatory in nature on the concepts of sexual harassment and abuse, gender-based violence, abuse and harassment response. At the same time, through trainings, employees will be familiarised with the Project's Grievance Resolution Mechanism (described in detail in the Project's SEP document) and the steps to follow when exercising their legal rights. Brochures and posters containing the grievance redress mechanism and contact details of the authorised person will be available in places such as cafeterias, canteens, service areas used by employees. It is important for the Project Owner to emphasise that the right of workers to access the public grievance mechanism for non-work related issues will be protected.

Grievances should be investigated as soon as possible to prioritise resolution. Regardless of the general timeframes for response and resolution, some grievances may require immediate attention, such as where workers' livelihoods are at stake.

The management of the structured grievance mechanism is described in detail in the following text.

Step a) Identification of the complaint

Complaints can be made to the Grievance Mechanism Officer in person or⁷ via phone, letter, complaint boxes, or email.

Step b) The complaint is recorded in the ' Grievance Log'

After the complaint is received and recorded, the Grievance Mechanism Officer will determine the department, management, or personnel responsible for resolving the complaint, depending on the subject and issue.

When it is determined that the complaint is outside the scope of the Project Grievance Mechanism, the complainant should be notified through their preferred communication method, and an alternative solution should be proposed.

Step c) Grievance Tracking

The Grievance Mechanism Officer and relevant departments should evaluate the findings related to the complaint. This evaluation should aim to identify and analyse the cause of the complaint and determine appropriate impact mitigation measures. The analysis of the complaint involves evaluating the complaint from various perspectives, such as the employee's background, the frequency of the complaint, management practices, and recent developments in the workplace.

In necessary cases, within the scope of the complaint investigation, the Grievance Mechanism Officer may also hold one-on-one meetings with the relevant parties to ensure a more detailed understanding of the issue in question. A site visit may be deemed necessary to understand the nature of the complaint firsthand and to verify its validity and significance. The visit should also be conducted to verify the validity and seriousness of the complaint.

After the data related to the complaint is transferred to the relevant management unit, the complaint in question is discussed with the reporting worker and the regional and/or unit manager. The investigation phase must be completed within a maximum of 5 business days after the complaint is received.

⁷ If the complaint is received directly by the Grievance Mechanism Officer or the worker representative, it will be recorded directly on the Grievance Form. All personnel involved in the project will be informed that all complaints should be communicated to the Grievance Mechanism Officer as soon as possible.

Step d) Resolution and closure of the complaint

Based on the understanding that the grievance mechanism is developed in consultation with the relevant departments or management, a resolution and closure process is established. The appropriate solution to the complaint should be communicated to the complainant in an appropriate manner within 2 business days after the complaint investigation phase is completed.

If the issue is outside the scope of the Grievance Mechanism Officer, the complaint should be referred to the Project Management Unit. The purpose of this is to try to resolve complaints within 7 business days after they have been referred.

Step e) Complaint Process Record

After the complaint is resolved and this is communicated to the complainant, it is closed with a signature obtained from the authorized complaint handler. When updating the Grievance Log, the current status of the complaint and clarifying information on how the complaint was resolved should also be noted in the Grievance Log. The purpose of providing more information about the complaint record is to serve as a reference source for any similar complaints that may arise in the future.

In cases where the identity is kept confidential, a summary of the complaint and its resolution should be posted on bulletin boards and common areas within the project site and announced in safety meetings or weekly meetings.

There is a worker grievance mechanism for Nata Agriculture's existing operation and complaints are recorded (Annex-P). The worker grievance mechanism will be in place during the construction and operation phases of the Project and will be updated as necessary. Relevant staff responsible for managing the employee grievance mechanism has been appointed. Experts are familiar with the grievance mechanism. All employees will be informed about the grievance mechanism before starting work. Grievance boxes and informative brochures will be available at the Project construction site.

8.2.2 Public Grievance Mechanism

Complaints should be investigated as soon as possible to prioritise resolution. Regardless of the general timeframes for response and resolution, an urgent security issue or issues relating to the livelihoods of local people may require an immediate response.

There are 10 steps that complement the grievance mechanism. This process is described in detail in the text below.

Step 1: Determination of the Grievance

Complaints will be identified by the authorized personnel, and the process will be managed. Complaints can be submitted in person, by phone, by letter, through complaint boxes, or via email:

Step 2 : Recording the Complaint in the Grievance Log

After the complaint is received, it will be recorded in the ' Grievance Log' (in paper or electronic format) within one day. The Grievance Log will be managed by the authorized person. Then, the importance of the complaint will be assessed within five to seven days.

The criteria for importance are outlined in the list below:

Level 1 Grievance: an individual or "one-off" complaint (within a specific reporting period - one year) and is primarily a local complaint by nature.

Note: Some one-time complaints, e.g., when a national or international law is violated (see Level 3), may be significant enough to be considered a Level 3 grievance.

Level 2 Grievance: A complaint that is commonly found and repeated (e.g., noise, dust, etc. caused by the facilities).

Level 3 Grievance: A one-time complaint or widespread and/or repeated complaints; also complaints resulting in serious violations of Project Policies or national legislation, complaints leading to negative national/international media attention, complaints believed to cause negative comments from the media or other key stakeholders (for example, inadequate waste management).

When it is assessed that the complaint is outside the scope of the Grievance Mechanism, the complainant should be notified through their preferred communication method and an alternative resolution path should be suggested.

Step 3: Acceptance of the Grievance

The grievance process is expected to be completed within 14 business days after the application is submitted (except for complaints that require immediate attention). If the complaint is not well understood or if additional information is needed, an explanation will be requested from the complainant at this step.

Step 4: The level of the Grievance

The level of 1st, 2nd, or 3rd grievances is determined by the authorized person, and all Level 3 grievance are reported to the Project Manager. It will consult with the senior management of the Project Owner and the Grievance Mechanism Officer to decide who should handle the complaints and determine whether additional support is needed for the response.

Step 5: Forwarding the grievance to the relevant departments

The mechanism officer forwards the complaint via email to the relevant department(s)/personnel (e.g., human resources, relevant administrative departments, etc.) within five to seven days to ensure an effective response is created.

Step 6: Responding to the grievance

If necessary, with the contributions of the upper management of the relevant departments, a response is prepared by the team to which the complaint has been assigned within 14 days. The response should provide a solution appropriate to the complaint, which may include additional information to clarify the situation by taking measures to reduce the issues, or it should compensate for all damages caused during the Project activities with financial compensation.

Step 7: Responding to the grievance

In Level 3 grievances, the relevant department's senior manager will close the complaint within 14 days, while in second-level and Level 1 grievances, it will be closed by the authorized person. Closure can be in the form of a signature on the complaint record or an email from the authorized person indicating the agreement that should be referenced in the complaint record. The authorized person makes the necessary filings and records the data in the Grievance Log.

Step 8: Sending an appropriate response to the grievance

The communication established for the response to the complaint should be carefully coordinated. The authorized person ensures that an approach to delivering the response is accepted and implemented.

Step 9: Checking whether the grievance has been properly closed

The complainant's response is recorded to help evaluate whether the complaint has been properly closed or whether further action is needed. The authorized person should use appropriate communication channels, such as phone or face-to-face meetings, to verify whether the complainant understands and is satisfied with the response.

If the grievance is made anonymously, a summary of the grievance and its resolution should be posted at the security booth at the entrance of the project area and also at the neighborhood headmen's offices in the affected areas. Additionally, the authorized personnel should communicate with the neighborhood headmen about the anonymous complaints and their resolutions.

If possible, the complainant's response should be recorded in the Grievance Log, which includes notes on impact mitigation measures to prevent the complaint from occurring in the future.

In the event that a specific issue communicated through the complaint mechanism cannot be resolved, the authorized person will provide a detailed explanation/justification as to why it could not be addressed. The response will also include an explanation of how the person who raised the complaint can continue with their complaint if the outcome is not satisfactory.

Step 10: The grievance is closed with the signature of the Authorized Person.

The mechanism officer evaluates whether a complaint can be closed or if further investigation is needed regarding the issue. If further attention to the matter is required, the Mechanism official should return to Step 2 to reassess the grievance.

After evaluating whether the grievance can be closed, the Mechanism officer will either close the complaint or seek the approval of the relevant administrative departments for the closure of level 3 complaints. Approval can be in the form of a signature to be affixed to the complaint record or an equivalent email to be filed by the Mechanism official and referenced in the grievance log.

There is an established public grievance mechanism. The relevant staff responsible for managing the public grievance mechanism has been appointed. Stakeholders were informed about the grievance mechanism during the public participation meeting held. Grievance boxes and informative brochures will be placed outside the Project construction site

9 MONITORING

In the Project, monitoring measures will be implemented throughout the life cycle of the Project. The Stakeholder Engagement Plan will be reviewed annually and updated as necessary based on developments in the Project and unexpected public responses. The Grievance Redress Mechanism (GRM) established for the Project will be effectively utilised and a statistical summary of the outputs of the GRM will be reported to the Project Company and lenders. Thus, the issues where grievances are concentrated, the number of grievances, grievance resolution methods and timing will be monitored through the Grievance Register and database in Annex-4.

Key Performance Indicators (KPI) to be used during the implementation of the Stakeholder Engagement Plan are given in [Table 9-1](#) below:

Table 9-1. Key Performance Indicators (KPI) and monitoring activities - Stakeholder Engagement

No	KPI	Target	Monitoring Method
1	Number of Internal and External Stakeholder Complaints	Annual increase and/or decrease data	Database
2	Number of complaints responded to within the targeted one-month timeline	Target 90%	Database
3	Providing feedback to stakeholders on the implementation of the Grievance Mechanism	Providing regular reports to stakeholders on the results of the Grievance Procedure	Reporting
4	Grievance Internal Audit Procedure to ensure that the Grievance Mechanism is implemented and grievances are handled in accordance with the criteria	Annual audit target to close 90% of complaints within one month and to the satisfaction of the complainant	Audit Report

ANNEX - 1 Consultation Form Sample

NATA TARIM	NATA TARIM					
	Consultation Form					
Person Filling in the Form:			Date and Time:			
Interview Agenda:						
1. INTERVIEW INFORMATION						
Interviewed Organisation:			Form of Communication			
Name-Surname of the Interviewee:			Telephone / Toll Free Line	<input type="checkbox"/>		
Telephone:			Face to Face Interview	<input type="checkbox"/>		
Address:			Website / E-mail	<input type="checkbox"/>		
E- mail:			Other (Describe)	<input type="checkbox"/>		
Stakeholder Type						
Public Institution <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>		
Interest Groups <input type="checkbox"/>	Industry Associations <input type="checkbox"/>	Labour Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>		
2. INTERVIEW DETAILS						
Questions about the project:						
Concerns/feedback on the project:						
Responses to the views expressed above:						

ANNEX - 2 Grievance Form Sample

Grievance Owner	[] External Stakeholder	[] Internal Stakeholder
Date		
Reference Number		
Name Surname	You can choose not to have your identity shared with third parties without your consent or you can remain anonymous upon your request. <input type="checkbox"/> I prefer not to share my identity information. <input type="checkbox"/> I would like to submit my request anonymously.	
Please mark how you would like to be contacted (post, telephone, e-mail).	<input type="checkbox"/> Mail: Please write your full address: <input type="checkbox"/> Personal: <input type="checkbox"/> Telephon: <input type="checkbox"/> E-mail: <input type="checkbox"/> Other:	
Province / District / Neighbourhood / Village		
Grievance Type		
• About the assets/properties affected by the project		
1. Compensation Payments (delay, valuation, discrimination, lack of information)		
2. Infrastructure Issues		
• Reduction or complete loss of income sources		
• Environmental Issues (pollution, noise, dust, etc.)		
• Damage to property (goods, buildings, land, etc.)		
• Job Application		
• Traffic, Transport, Other Risks		
• Community Health		
• Quality of Life (security issues, cultural conflicts)		
• Other (Please specify):		
Description of the complaint (WHAT, WHEN, WHERE, WHY, CAUSE, EFFECT) Please briefly describe the cause-effect relationship of the complaint		

Have you complained about the same issue before?	
Do you know if anyone else in the area has the same problem?	
Please indicate if you have any requests or suggestions to resolve your complaint.	
Please do not fill in this part of the form.	
To be filled in by the project officer	
How was the complaint received?	
<input type="checkbox"/> Personal Application	
<input type="checkbox"/> By Phone	
<input type="checkbox"/> By Mail	
<input type="checkbox"/> From Grievance Box (please indicate the box number)	
<input type="checkbox"/> Other (please explain)	
Grievance Record Date:	
Is an answer required?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	

ANNEX - 3 Grievance Closure Form Sample

Grievance Owner	<input type="checkbox"/> External Stakeholder <input type="checkbox"/> Internal Stakeholder	
Is it an emergency?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Grievance Closing Number		
Grievance Application Date:		
Targeted Grievance Closure Date:		
Stakeholder Contact Details, if provided		
Preferred means of communication		
Description of the Grievance		
Is Compensation Required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Level of Grievance and Assessment of Grievance		
CONTROL OF COMPENSATORY WORKS AND DECISION PROCESS		
Stages of Compensation Studies	Completion Date and Responsible Party	
1.		
2.		
3.		
4.		
5.		
6.		
Signature:		
Date:		
In case the grievance is not anonymous Is the grievance satisfied with the remedial action taken for his/her complaint?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Comment:
Şikayet yeniden incelensin mi?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Comment:

New Grievance Number		:	
Closing the Grievance: To be Completed by the Non-Anonymous Complainant			
Name and surname of the complainant			
Are you satisfied with the remedial measures taken for your complaint?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Comment:
Signature of the Complainant		Date:	
The grievance will be completed by the relevant Project Officer			
Are you satisfied that the complaint has been resolved?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Comment:
Signature of Public Relations Specialist		Date:	

ANNEX - 4 Grievance Record Sample

Complaint Registration Number	How to Complaint was Received (Complaint Form, Community Meeting, Telephone)	Complaint Level	Date of Complaint Received	Place of Complaint Received	Name of the Person Receiving the Complaint	Parcel of land # (If the complaint is about land)	Complainant Information					Grievance Related Project Component	Category of Grievance (related to expropriation/land acquisition, environmental problems, damage to buildings, etc.)	Summary of Complaint	Complaint Status (open, closed or pending)	Action Taken				Supporting Documents for Closing the Complaint (bank receipt for compensation, complaint closure protocol)
							Name Surname	Identity Number	Telephone/ e-mail	Village/ Neighbourhood- District	Gender					Responsible Person/Unit	Action Planned	Deadline for Handling the Complaint	Date of Action Taken	