



ILBANK



Türkiye Public and Municipal Renewable Energy Project (P179867)

Stakeholder Engagement Plan (SEP)

April 2023

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Abbreviations

CEO	Community Engagement Officer
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GM	Grievance Mechanism
GRS	Grievance Redress Service
ILBANK	İller Bankası A.Ş.
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-governmental Organization
PAP	Project Affected People
PDO	Project Development Objective
PIU	Project Implementation Unit
PMU	Project Management Unit
RF	Resettlement Framework
RP	Resettlement Plan
SEP	Stakeholder Engagement Plan
PUMREP	Public and Municipal Renewable Energy Project
WB	World Bank

GLOSSARY

Grievance Mechanism: It is a mechanism that has been developed for potential use by project stakeholders to achieve mutually agreed resolutions for their grievances. It ensures that complaints and grievances are addressed through a transparent and impartial process.

Implementing Agency: Refers to the İller Bankası A.S (ILBANK), which will assume overall responsibility for the project.

Project: Türkiye Public and Municipal Renewable Energy Project.

PIUs: Refers to the staff of PIUs to be established for each of the municipalities benefiting under the Project.

PMU: Refers to the staff of the Project Management Unit (PMU), established under the International Relations Department of ILBANK.

Stakeholder: Refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); and (b) may get involved directly or/and have an interest in the project (other interested parties).

Stakeholder Engagement: It is a continuous process used by the project to engage relevant stakeholders to generate sense of ownership to the project and for a clear purpose to achieve accepted outcomes. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, stakeholder involvement in project monitoring, reporting to stakeholders and management functions. It includes both state and non-state actors.

Stakeholder Engagement Plan (SEP): A SEP is a tool for managing communications with the project stakeholders at the sub-project or activity level. The SEP will describe the timing and methods of engagement with stakeholders throughout the life cycle of the project as agreed between Bank and Borrower, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them. When a project consists of a program and/or series of sub-projects and the stakeholders/stakeholder engagement program cannot be identified in detail until the program/sub-project details have been identified, the SEP may be prepared initially as a framework instrument.

Project Level SEP: The SEP prepared by ILBANK PMU which guides ILBANK's own efforts at stakeholder engagement as well as providing a framework to guide the preparation of individual sub-project specific SEPs by the PIUs.

Sub-Project Specific SEPs: SEPs will be prepared by each PIUs for each sub-projects that reference the Project Level SEP.

EXECUTIVE SUMMARY

The PUMREP will support the Government of Türkiye to scale-up renewable energy use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities by addressing the barriers discussed above and help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security.

The Project Development Objective (PDO) is to support the power sector decarbonization through increasing the use of renewable energy (RE) in public facilities.

The SEP has been prepared in accordance with the World Bank's ESS10 Stakeholder Engagement and Information Sharing.. This SEP provides a framework to support the establishment of a continuous engagement process between municipalities and those who potentially would be impacted or have any kind of interest in the Project (stakeholders). Besides, it will also help to manage stakeholder expectations and support the management of risks, and therefore reducing potential conflicts and project delays by providing early, frequent and open communication throughout the life of the project. This SEP also will be a framework for SEPs to be prepared for sub-projects. This SEP is prepared by ILBANK for Component 2 and Component 3 activities of PUMREP.

This Document is a “Project level” SEP prepared by ILBANK, which guides ILBANK's own efforts at stakeholder engagement as well as providing a framework to guide the preparation of individual sub-project level SEPs by the municipalities/utilities.

This SEP explains the stakeholder engagement process, including the identification and analysis, key principles, method and proposed strategy for vulnerable groups. The potential stakeholder groups have been identified, and their level of interest and level of influence have been analyzed. The engagement activities will be carried out in a culturally appropriate manner and will include best practice approaches to interact with stakeholder groups so that the project may establish effective relationships for stakeholder engagement. All information regarding the Türkiye Public and Municipal Renewable Energy Project (PUMREP) will be made accessible on ILBANK's, municipalities' and the WB's official websites. Within the scope of the project, brochures, leaflets, booklets and/or posters will also be developed to inform stakeholders about the project activities.

It is of particular importance to understand whether project impacts disproportionately affect disadvantaged/vulnerable individuals or groups who are often unable to raise their concerns or understand the impacts of a project. Interaction with vulnerable groups and individuals often requires special measures and assistance to ensure that these groups and individuals are well aware of the overall process and their contribution to the process is in balance with other stakeholders and focused on establishing their participation.

Stakeholder engagement is an on-going process that spans throughout the life of the project starting from planning and design, construction, operation until the end of decommissioning. The PMU in ILBANK will be responsible for the overall implementation of the PUMREP Project, including the implementation of the SEP.

ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Project.

1. Introduction

This document is a Stakeholder Engagement Plan (SEP) that explains the stakeholder consultation and engagement process planned and to be implemented for the Türkiye Public and Municipal Renewable Energy Project (PUMREP) and prepared by ILBANK. This SEP is prepared by ILBANK for Component 2 and Component 3 activities of PUMREP. This document is a “Project level” SEP which guides ILBANK’s own efforts at stakeholder engagement as well as providing a framework to guide the preparation of individual sub-project specific SEPs by the municipalities/utilities.

The SEP has been prepared in accordance with the World Bank's ESS10 Stakeholder Engagement and Information Disclosure. Stakeholder engagement is an inclusive process that will be carried out throughout the life of the project. When properly designed and implemented, it supports the establishment of strong, constructive and sensitive working relationships that are important for the successful management of the project's environmental and social impacts and risks. This SEP provides a framework to support the establishment of a continuous engagement process between municipalities and those who potentially would be impacted or have any kind of interest in the Project (stakeholders). Besides, it will also help to manage stakeholder expectations and support the management of risks, and therefore reducing potential conflicts and project delays by providing early, frequent and open communication throughout the life of the project.

Another goal of this SEP is to improve and facilitate decision making and create continuous dialogue between ILBANK itself and project-affected people (PAP) and other stakeholders in a timely manner, and to ensure that these groups are provided equal and sufficient opportunity to voice their opinions and concerns that may influence Project decisions. This SEP will also serve as a base for the SEPs that will be prepared for each subproject once the investments are determined.

The key objectives of the SEP can be summarized as follows:

- To establish a systematic approach to stakeholder engagement that will help municipalities identify stakeholders, and to build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties;
- To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with project affected parties throughout the Project life cycle on broader issues of community development and inclusion beyond specific sub-project issues;
- To ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format; and
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow municipalities to respond to and manage such grievances

Effective stakeholder engagement promotes a “social license” to operate and is founded on mutual trust, respect and transparent communication between investing municipalities and its stakeholders. A well-established stakeholder engagement process improves decision making as well as increasing project performance by managing costs and risk, avoiding conflict, improving corporate policy, providing continuous feedback to management on project implementation and impacts, and managing stakeholder expectations.

2. About the Project

The PUMREP will support the Government of Türkiye to scale-up renewable energy use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities by addressing the barriers discussed above and help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security.

The Project Development Objective (PDO) is to support the power sector decarbonization through increasing the use of renewable energy (RE) in public facilities.

3. Project Components

The Project includes three components: (a) Renewable Energy investments in central government buildings; (b) Renewable Energy investments in municipalities; (c) Technical Assistance and Project Implementation Support.

Component 1. Renewable Energy investments in central government buildings

This component will support introducing RE technologies in central government and central-government-affiliated buildings (e.g., public buildings under central ministries, universities, and hospitals) and will be implemented by the General Directorate of Construction Affairs (GDCA) under the Ministry of Environment, Urban and Climate Change (MoEUCC). RE installations will be primarily used to offset the building's electricity and fuel consumption (i.e., for self-consumption purposes rather than to generate power to sell to the grid). While potential subprojects are likely to be solar PV, based on the preliminary pipeline provided by MoEUCC, eligible RE technologies include rooftop or ground-mounted solar PV and solar water heating. In addition, this component will include a pilot for a small subset of the subproject portfolio to combine solar PV investments with upgrades of existing (fossil-fuel based) heating and cooling systems to electric heat pump-supported systems. Through combining these investments into a building, the solar PV system can offset the increase in electricity consumption from the new heat pump. Potential eligibility criteria for central government buildings would include, inter alia, but are not limited to (i) ownership by (or assigned to) the central government; (ii) no plans for office moves, closure, building demolition or privatization; (iii) must be structurally and seismically safe, with no high flood risk; (iv) must have adequate energy performance; and (v) already have connection agreement. The eligibility criteria for RE technologies and buildings will be finalized during the Project preparation stage.

Component 2. Renewable Energy investments in municipalities

This component will support introducing RE technologies in municipalities and will be implemented by İller Bankası A.S. (ILBANK). The RE installations will be primarily used to offset the overall energy consumption from public facilities (e.g., administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills. A preliminary pipeline of about 100 subprojects has been provided by ILBANK, including the tentative capacity of the RE installations (ranging from 0.2 MW to 5 MW), required investment costs, and the status of grid connection permits. Although most of these proposed subprojects are solar PV (both rooftop and ground-mounted), other RE technologies may also be considered for support during project preparation. The eligibility criteria for RE technologies and sub-project locations will be finalized during the Project preparation stage.

Component 3: Technical Assistance and Project Implementation Support

This component will finance project management and implementation support activities, including, inter alia, project development costs for early subprojects, such as marketing and outreach; preparation and/or technical review of feasibility studies; day-to-day project management such as bidding document preparation, tendering process management, contract management, supervision of installation and works; implementing financing requirements in compliance with Bank's fiduciary policies and guidelines; implementing environmental and social framework (ESF); Project monitoring and evaluation; and other Project communications. Specific TA needs from MoEUCC and ILBANK will be identified during the Project preparation and included in the Project design to ensure the sustainability of the Project. This SEP is prepared by ILBANK for Component 2 and Component 3 activities of PUMREP. The Component 1 will be implemented by Ministry of Environment, Urbanization and Climate Change (MoEUCC) and there will be a separate SEP document for this component.

4. Regulations and Requirements

4.1. National Legislation for Stakeholder Engagement

Right to Information Act (No. 4982)

The purpose of this law is to regulate the procedure and basis of the right to information in accordance with the principles of equality, impartiality and openness, which are the requirements of a democratic and transparent government. According to the obligation to provide information (Article 5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to applicants; and to evaluate and decide on applications promptly, effectively and correctly.

Law on the Exercise of the Right to Petition

Based on "Article 3 of the Law on the Exercise of the Right to Petition", citizens of the Republic of Türkiye, may submit their complaints to the Grand National Assembly of Türkiye through written petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Türkiye are entitled to enjoy this right.

Constitution of the Republic of Türkiye

Stakeholder engagement is secured by the Constitution of the Republic of Türkiye. The Constitution contains provisions that ensure that people can freely express their views. Article 25 of the Turkish Constitution is the article "Freedom of thought and opinion". According to this article, nobody can be forced to express their thoughts and convictions for whatever reason and purpose; cannot be condemned or accused because of his thoughts and convictions. As emphasized by the "Freedom to Explain and Spread Thought (Article 26 of the Constitution of the Republic of Türkiye)"; everyone has the right to express and disseminate their thoughts and opinions individually or collectively by word, text, picture or other means. This article also covers the freedom to receive or impart information or ideas without the intervention of the official authorities. At the same time, everyone has the "Right to Petition" (Article 74 of the Constitution of the Republic of Türkiye). Accordingly, the principle of reciprocity citizens and foreigners residing in Türkiye on condition that observance, on their own or with the wishes and complaints about public authorities and Türkiye has the right to appeal in writing to the National Assembly.

The Presidency's Communication Center (CİMER) is an official government tool used to receive requests, complaints and applications from the public. Communication channels of CİMER are as follows:

Website	https://www.cimer.gov.tr https://giris.turkiye.gov.tr/
Hotline	150
Post Address	T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara
Telephone	+90 312 590 2000
Fax	+90 312 473 6494

Public institutions and organizations shall provide the requested information within 15 working days. If the requested information or document is to be obtained from another unit within the relevant institution or if the opinion of another institution is required or the content of the application pertains to more than one institution; the access shall be provided within 30 working days. In this case, the applicant shall be informed in writing about the extension and its reasons within 15 working days (Article 11).

Regulation on Environmental Impact Assessment

The Environmental Law No. 2872, which was published in the Turkish Official Gazette No. 18132 dated 11 August 1983 and amended in the Official Gazette dated 29 Mays 2013 (by Law No. 6486), establishes the underlying legal framework of the environmental legislation in Türkiye and is supported by a large number of regulations. Article 10 of the Environmental Law constitutes the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 31907 dated 29 July 2022.

Within the scope of EIA, for the projects included in the Annex-I list, a public participation meeting (PPM) will be organized by the bodies and organizations authorized by the Ministry of Environment, Urbanization and Climate Change (MoEUCC) with the participation of the project owner on the date set by the MoEUCC and at the place and time determined by the Governor's Office before the Committee determines the scope to inform the public about the investment and to hear their opinions and suggestions regarding the project.

4.2. World Bank Requirements for Stakeholder Engagement

World Bank Requirements

The Environmental and Social Standard (ESS) 10 "Stakeholder Engagement and Information Disclosure" of the World Bank's Environmental and Social Framework (ESF) recognizes, " the importance of open and transparent engagement between the Borrower (ILBANK PMU) and project stakeholders as an essential element of good international practice." In more detail, the requirements set out by ESS10 are as follow:

1. "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts"
2. "Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation."
3. "The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders."

4. “The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” (World Bank, 2017: 98)”.

ILBANK PMU is the “Borrower” and Municipalities/Utilities will be the “Sub-Borrower”. ILBANK will ensure that Municipalities/Utilities will apply the relevant World Bank Requirements for the implementation of sub-project specific SEPs.

Stakeholder Engagement Plans (SEPs) specific to sub-projects should be prepared in line with the above-mentioned principles and guidelines provided within this Project Level SEP. In addition to this SEP guiding ILBANK’s own efforts at stakeholder engagement, it is also a framework to guide the preparation of individual sub-project specific SEPs. The sub-project specific SEPs will be developed proportionate to the nature and scale of the project, as well as its possible risks and impacts.

The Borrower will be responsible to respond to the suggestions and grievances raised by the project affected parties regarding the environmental and social performance of the project in a timely manner. To this end, the Borrower will propose and implement a grievance mechanism (GM) to receive and facilitate resolution of suggestions and complaints. The scope, scale and type of the required GM will be proportionate to the nature and scale of the potential risks and impacts of the project. The GM may include: (i) enable submission of grievance and concerns in person, by phone, e-mail and/or website; (ii) a log where grievances are registered in writing and maintained as a database; (iii) publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances; (iv) transparency about the grievance procedure, governing structure and decision makers; (v) an appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved.

5. Stakeholder Engagement Process

Based on this SEP, municipalities/utilities will need to prepare a separate SEP for each of their sub-projects. In doing so, they will follow the below mentioned process.

5.1. Stakeholder Identification and Analysis

Once the sub-projects’ footprints are determined, the primary step in stakeholder engagement process will be to identify the Project’s stakeholders. In identifying the stakeholders, municipalities will also determine the needs and expectations for engagement, including their priorities and objectives in relation to the Project. After the identification of stakeholders, municipalities will choose the best engagement method and tool to engage with each stakeholder.

There may be individuals and groups who may be disproportionately affected or further disadvantaged by the project(s) compared to all other groups due to their vulnerable status, and that may require specific engagement efforts in consultation and decision-making to ensure their equal representation in the consultation and decision-making process associated with the project. Therefore, it is important that municipalities/utilities investigate the impacts and risks of their sub-projects on different stakeholder groups including vulnerable groups. The engagement method should be tailored to each identified stakeholder groups ensuring their involvement in the project.

This project level SEP and the subproject specific SEPs are living documents, like other ESF instruments, which can be updated and revised according to changing circumstances of the project and sub-projects. Stakeholders identified in the design phase of a project may change during implementation and therefore will need to be updated accordingly. The identification and analysis of the stakeholders should be performed as early as possible in the project life cycle, taking into account the dynamics between stakeholders and the risks and opportunities of their involvement in the Project, and should:

- Categorize stakeholders in accordance with their level of impact and interest in the project/sub-projects. Stakeholders will be defined in line with the ESS10 as;
 - Stakeholders are affected or likely to be affected by the project (*project-affected parties*),
 - Stakeholder may have an interest in the project (*other interested parties*)
 - Vulnerable groups
- Present how each stakeholder group (vulnerable groups, individuals, organizations, government institutions, etc.) will be affected by the project and how will influence the Project – *directly or indirectly*; through taking into account:
 - the area of influence; geographical location where anticipated impacts (both positive and negative) will occur, and therefore the localities within which people and businesses could be affected, and
 - the nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues.

Depending on the magnitude of impact and influence of the sub-project on the stakeholders, and vice versa, the frequency and scope of the engagement methods will proportionally change. The sub-project SEP will provide information on vulnerable groups (if any) such as women, elderly, people with disabilities, refugees, seasonal workers etc.. All engagement methods selected should avoid manipulation, interference and intimidation, and will be carried out by providing timely, relevant, understandable and accessible information in a culturally appropriate way for each of the different stakeholder group targeted. Table 1 below summarizes the potential interests and influence for each of the affected parties mentioned above.

Table 1. Stakeholder Groups for PUMREP Project

Component 2 Renewable Energy investments in municipalities			Level of Interest	Level of Influence
Stakeholder Group				
Project Affected Parties	Direct Stakeholders	<ul style="list-style-type: none">• Communities likely to be affected by the construction works in the scope of component• Workers to be employed for the construction activities• Municipalities• Utilities• Local businesses	High	High
	Indirect Stakeholders	<ul style="list-style-type: none">• Neighborhood residents• Local community organizations	Medium	Medium
Vulnerable individuals or groups		<ul style="list-style-type: none">• Disabled individuals• Elderly individuals• Immigrants, refugees and non-native Turkish speakers	High	High
Other Interested Parties		<ul style="list-style-type: none">• NGOs• Media• Public institutions	Medium	Medium
		<ul style="list-style-type: none">• Workers to be employed for the construction activities• Local administrators	High	High
Component 3 Technical Assistance and Project Implementation Support			Level of Interest	Impact Level

Stakeholder Group				
Project Affected Parties	Direct Stakeholders	<ul style="list-style-type: none"> • Municipalities • Utilities 	High	High
	Indirect Stakeholders	<ul style="list-style-type: none"> • ILBANK • Public institutions 	Medium	Medium

5.2. Key Principles of Stakeholder Engagement

The project level SEP and relevant sub-project specific SEPs to be prepared will ensure that the following key principles are applied to all engagement activities:

- The timing and number of engagement activities is designed to maximize stakeholder involvement while avoiding disruption of the ‘daily business’ of local stakeholders in particular as well as avoiding ‘consultation fatigue’
- All engagement activities are in line with project specific SEP schedule and parallel to the commitments made in ESMPs and also RPs if any.
- Ensure that all engagement activities are recorded and findings/feedback that require any action to be taken is incorporated to relevant documents, shared with responsible parties and followed up in a timely manner
- Ensure that every engagement activity is culturally appropriate, sufficient and disseminated in a timely manner with equal access to all relevant stakeholders allowing for their increased participation and feedback
- Project specific SEPs are updated as required during the project life cycle.

5.3. Methods for Stakeholder Engagement

A variety of engagement techniques will be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

The level of impact, in addition to the needs and concerns of the stakeholders will determine the basis of the communication tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 2 below. These methods and tools are identified in line with the currently available project information and need to be revised accordingly while preparing the project specific SEPs. The language of communication throughout the Project is expected to be Turkish; however, different languages will be also taken into consideration, if need be, to increase the efficiency of the engagement activities and ensure involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

Table 2. Engagement Methods to be Employed under the Project

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> - Information sharing (in particular technical) on project requirements and impacts - Invitations to meetings and key events during project implementation - Arrangements for obtaining permits, licences, transfer, and allocation of project land - Information and data requests that will be utilized for project implementation 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organisations/agencies
One-on-one meetings	<ul style="list-style-type: none"> - Information collection on an individual basis allowing stakeholders to voice their concerns/opinions about sensitive issues 	Representatives of relevant state authorities and government

Engagement Method	Application/Purpose of the Method	Target Stakeholder
	<ul style="list-style-type: none"> - Establishing personal connections with key actors 	officials, NGOs, local government, academia, and organisations/agencies, contractors and consultants
Formal meetings	<ul style="list-style-type: none"> - Collective information sharing on project requirements and impacts - Receiving comments, feedback, views and perception of project from a group of public institutions - Establishing relations with public institutions 	Different national and local government authorities and officials, NGOs, academia, and organisations/agencies, national and local media
Consultation meetings	<ul style="list-style-type: none"> - Information sharing (especially non-technical) to a large group of stakeholders, especially communities about the scope and timeline of the Project and sub-project activities. - Receiving comments, feedback, views and perception of project from a group of stakeholders - Collecting grievances and concerns related to the project - Establishing relations with affected communities, and groups 	Any stakeholder group identified throughout the project including the affected communities and groups, local NGOs, national and local government representatives/authorities, businesses, organisations/agencies, etc.
Face to face interviews	<ul style="list-style-type: none"> - Collecting baseline data on an individual basis with regard to project-affected people (PAPs) impacted by the project - Understanding, monitoring and assessing the project activities' environmental and social impacts and risks on an individual basis - Establishing relations on an individual basis 	PAPs, project workers (including workers to be employed for the construction activities, PMU and PIU staff, contracted workers, etc.), vulnerable/disadvantaged groups/people,
Focus group discussions	<ul style="list-style-type: none"> - Information sharing on a specific topic to a certain group of people including vulnerable groups - Receiving comments, feedback, views and perception of project from a certain group - Collecting grievances and concerns related to the project from a certain group - Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders - Establishing relations with certain groups 	Stakeholder groups relevant to the information to be shared and discuss during the meeting, vulnerable groups
Project/Municipality/ILBANK website	<ul style="list-style-type: none"> - Sharing project relevant information and update on progress - Disclosing project/subproject related documentation and communication tools: ESMP, RP, Ex-Post social audit document, grievance mechanism (GM), presentations, brochures, etc. - Announcements of key events (date/time, venue) 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Digital communication tools social media (<i>Facebook, Twitter, Instagram accounts, WhatsApp groups</i>), <i>national/local television channels, radio stations, SMS, etc.</i>	<ul style="list-style-type: none"> - Non-technical information sharing and progress updates - Announcements of key events, dates and published documents related with the Project 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies

Engagement Method	Application/Purpose of the Method	Target Stakeholder
Project information brochures/leaflets	<ul style="list-style-type: none"> - Sharing brief project information to provide regular update - Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, scope of project activities and subprojects, etc. - Disseminating site-specific project information 	Any stakeholder group identified throughout the project including affected communities and PAPs, businesses and organisations/agencies
Online meeting (alternative tool if needed)	<ul style="list-style-type: none"> - Information sharing on a specific topic to a group of people including vulnerable groups - Receiving comments, feedback, views and perception regarding the project from a certain group - Collecting grievances, concerns and feedback related to the project from a group - Monitoring project activities' environmental and social impacts and risks on a group - Establishing relations with local communities 	Any stakeholder group identified throughout the project, including project affected people, vulnerable groups, etc.
Grievance Mechanism (GM)	<ul style="list-style-type: none"> - Receiving and resolving any requests (such as suggestions, complaints, compliments, inquires for information or whistle-blower complaints) received by all project stakeholders 	Any stakeholder group identified throughout the project

All information regarding the PUMREP will be made accessible on ILBANK's, municipalities' and WB's official websites. Within the scope of the project, brochures, leaflets, booklets and/or posters will also be developed to inform stakeholders about the project activities.

The PMU and PIUs will be responsible for the sharing, delivering and announcing of project/sub-project documents, communication materials and GM.

In the light of information given in the previous paragraphs, the summary of the stakeholder engagement program is given in Table 3.

Table 3. The Overview of the Stakeholder Engagement Program

Project Phase	Consultation Subject/Message to be delivered	List of information to be disclosed	Method Used	Target Stakeholder	Frequency	Responsible Party
Preparation	<ul style="list-style-type: none"> • Inform the stakeholders about the scope and need of the Project. • Consult the stakeholders about <ul style="list-style-type: none"> ◦ project design, ◦ environmental and social risks and impacts, ◦ proposed mitigation measures, • GMs 	<ul style="list-style-type: none"> • Project concept, E&S principles and obligations • ESF documents (ESCP, Sub-Project Specific SEPs) 	<ul style="list-style-type: none"> • Opening meeting • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Project-affected stakeholders (direct/indirect) • Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>Before the commencement of component activities</p> <p>Throughout the project lifecycle</p>	<ul style="list-style-type: none"> • ILBANK • PIUs
Implementation & Construction	<ul style="list-style-type: none"> • Inform the stakeholders about the project scope and ongoing activities • E&S documents (ESMPs, RPs, Sub-Project Specific SEPs, etc.) • GMs 	<ul style="list-style-type: none"> • ESMPs • Sub-Project Specific SEPs • RPs • GM procedure • Regular updates on Project development/ implementation 	<ul style="list-style-type: none"> • Public announcements • Non-technical project summaries/presentations • Electronic publications • Social media • Press releases • Consultation meetings (virtual/face-to-face) • Digital communication tools • Grievance Mechanism • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Project-affected stakeholders (direct/indirect)Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>Prior to start of implementation of the project, and as needed during the project lifecycle</p>	<ul style="list-style-type: none"> • ILBANK • PIUs • Supervision Consultants • Contractors
Operation	<ul style="list-style-type: none"> • GMs 	<ul style="list-style-type: none"> • Project outputs • Redress of grievances 	<ul style="list-style-type: none"> • Closing Meeting • Consultation meetings • Disclosure meetings, • Digital Communication Tools/social media • Poster, brochure, leaflet, etc. • SMS 	<ul style="list-style-type: none"> • Project-affected stakeholders (direct/indirect)Disadvantaged/ Vulnerable individuals or groups • Other interested parties 	<p>After completion of sub-project activities, during the one-year warranty period</p>	<ul style="list-style-type: none"> • ILBANK • PIUs

5.4. Proposed Strategy for Including Views of Vulnerable Groups

It is of particular importance to understand whether project impacts disproportionately affect disadvantaged/vulnerable individuals or groups who are often unable to raise their concerns or understand the impacts of a project. Awareness raising and stakeholder engagement activities regarding the project should be implemented taking into account the special constraints and cultural sensitivities of these groups and individuals so that they fully understand the project activities and benefits. Interaction with vulnerable groups and individuals often requires special measures and assistance to ensure that these groups and individuals are well aware of the overall process and their contribution to the process is in balance with other stakeholders and focused on establishing their participation.

Within the scope of this Project, vulnerable individuals and groups can be disabled individuals, elderly individuals, and immigrants, refugees and non-native Turkish speakers. These groups in particular are experiencing certain disadvantages in benefitting from public services and are likely to be directly affected by sub-projects. These vulnerable groups will be defined in the SEPs of each particular sub-projects.

Table 4 summarizes the disadvantaged/vulnerable individual/group identification carried out for the project as well as the suggested stakeholder engagement methods for each disadvantaged/vulnerable individual/groups

Table 4. Summary of Disadvantaged/Vulnerable Individuals/Groups and Suggested Stakeholder Engagement Methods

Project Component	Vulnerable Groups and Individuals	Features/Needs	Preferred method for information sharing and consultation	Additional Resource Support
Component 2	Disabled individuals	Funding for training to assist individuals with lack of accessibility, information and special needs	Audio devices, accessible platforms, etc. special training needs	Special education coordinators, sign language translators/interpreters
	Elderly individuals	Lack of knowledge and inexperience about accessibility, online tools, services and communication channels	Communication methods in accessible areas	Not necessary
	Immigrants, refugees and non-native Turkish speakers	Those who have difficulties in communication	Translated documents, special translators, communication in accessible areas	Translators

To include the views of vulnerable groups:

- Engagements will be carried out with regional organizations and NGOs representing the rights of persons with disabilities;
- Separate consultations will be conducted for elderly individuals and disabled individuals (or people with additional accessibility needs), immigrants, refugees and non-native Turkish speakers, and other disadvantaged/vulnerable groups who may be identified during the project;
- Information on the project will be provided face to face or by any other appropriate method specific to disadvantaged/vulnerable groups/individuals to be specified or specified (e.g. visually impaired alphabet, sign language, etc.);
- Consultations will be conducted at locations that provide access to disadvantaged/vulnerable groups/individuals; and
- Any written or printed materials related to the project to be distributed at project sites should be accessible to the disadvantaged/vulnerable groups/individuals of the project; the materials will also be prepared in culturally appropriate and easy to understand (non-technical) language.

5.5. Timing of Stakeholder Engagement

Timely organization and execution of stakeholder engagement activities that will be conducted during implementation will be critical in supporting the Project's risk and impact management process. This is especially the case during the early identification and management of potential adverse and positive impacts and risks which will allow for a cost-effective project design.

Stakeholder engagement is an on-going process that spans throughout the life of the project starting from planning and design, construction, operation until the end of decommissioning.

Project specific SEPs prepared by the municipalities will include a stakeholder engagement program that covers the entire life span of the project and presents the timing, frequency of engagement activities, communication tools/method to be used, target stakeholders and responsible parties for each project phase (preparation, implementation/construction, operation).

6. Institutional Arrangements for Stakeholder Engagement

The PMU in ILBANK will be responsible for the overall implementation of the PUMREP. ILBANK has prepared this Project Level SEP which guides ILBANK's engagement with stakeholders on the broader objectives of the project, as well as providing a framework for municipalities to prepare sub-project specific SEPs.

The management, coordination and implementation of the sub-project specific SEPs and its integral tasks will be the responsibility of dedicated team members within the relevant municipality/utility.

For the implementation of the sub-project specific SEPs, the "sub-borrower" municipalities/utilities will be responsible for:

- Preparing, disclosing, consulting on, and updating the content of the draft sub-project specific SEP (in line with this project level SEP) and sharing it with ILBANK for final approval;
- After receiving ILBANK's clearance on the draft sub-project specific SEP, disclosing and implementation of final sub-project specific SEP;
- Assigning dedicated staff for the implementation and monitoring of engagement activities;
- Preparing relevant engagement tools and materials for the project specific SEP and ensuring their timely application and/or dissemination;
- Approving and facilitating all stakeholder engagement events and disclosure of materials to support stakeholder engagement events;
- Keeping records of all engagement activities, monitoring and reporting to ILBANK on a regular basis (through providing inputs on engagement activities in the semi-annual progress reports);
- Ensuring that all feedback received from tasks carried out are incorporated in relevant documents and reflected in the decision-making process; and
- Maintaining the stakeholder database.

PIUs in the municipalities will be responsible for the implementation of the Stakeholder Engagement Plans (SEPs) that will be prepared specifically for sub-projects and for communication with the communities throughout the life of the project.

The sub-project specific SEPs will be prepared by municipalities/utilities for the components in line with the principles provided in this Project Level SEP. All contractors responsible for certain sub-project activities will also be expected to apply the relevant provisions of the sub-project specific SEPs. The Grievance Mechanism (GM) requirements will be regulated in tender documentation and contracts signed with contractors.

The PMU will review the SEPs specific to sub-projects and share it with the WB for clearance; and after the SEP is mutually agreed with the WB, the PMU will review and give clearance to the sub-project specific SEPs for disclosure. Stakeholder engagement activities at sub-project level will be managed by

the PIU, while the stakeholder engagement activities at sub-project level will be carried out in collaboration with contractors and supervision consultants. All contractors responsible for specific project activities are also required to apply the relevant provisions of the SEP. GM requirements will be set out in the tender documentation and contracts signed with the Contractors.

Under the PMU of the ILBANK Department of International Relations, a GM Team has been established and is composed of the Social Expert of the PMU and the Technical Group Manager. The GM Team is responsible for the implementation of ILBANK GM Policy¹.

Table 5. Responsible Parties for SEP Implementation

Responsible Party	Responsibilities
ILBANK PMU	<ul style="list-style-type: none"> • Incorporating all stakeholder engagement activities which will be undertaken by ILBANK into the environmental and social management systems • Developing an internal system to communicate the progress and results of stakeholder engagement to senior management and employees • Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues. • Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues
Social Expert (PMU)	<ul style="list-style-type: none"> • Planning and implementation of the Project Level SEP • Ensuring that stakeholder engagement is understood by PIU members and other stakeholders • Organizing / managing Stakeholder Engagement/Consultation Meetings and related events on public information sharing at project level • Supporting other PMU staff who may interact with stakeholders • Coordinating interface and reporting to/from the World Bank on the implementation of the SEP/SEPs • Updating the Project Level SEP periodically and in case of major Project changes • Reviewing the sub-project specific SEPs <p>Monitoring and supporting the PIUs regarding communication with stakeholders and stakeholder engagement is at the maximum level</p>
Environmental Specialist (PMU)	<ul style="list-style-type: none"> • Monitoring the progress of the project • Ensuring the successful delivery of all defined documents • Consolidating reports on overall Project Level SEP activities and project progress • Implementing social and environmental monitoring • Monitoring and reporting about the social and environmental issues specified in the relevant documents that are implemented throughout the Project
GM Team, Social Expert (PMU)	<ul style="list-style-type: none"> • Acting as the focal point for the GM in the PMU • Keeping records and follow-up of the complaints related to the project • Managing and coordinating the solution process of project-related complaints • Inspecting grievance records to reveal relevant non-compliance issues or recurring issues with stakeholder engagement and other Project activities • Coordinating and monitoring GM contacts at the contractor level • Collecting project-related grievances from all different GM levels • Informing the PMU and management about the solution process

¹ https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_gm_policy_1646748212.pdf

	<ul style="list-style-type: none"> • Preparing compiled GM reports related to the project • Monitoring the grievance records of contractors and the resolution process of the grievances and reporting them to the PMU in monthly progress reports • Maintaining regular contact with the PMU in order to respond to grievances/find solutions
Procurement Specialist	<ul style="list-style-type: none"> • Providing consultancy in tenders to be held within the scope of the Project. • Ensuring that the GM and the other environmental and social instruments are incorporated into the tender documents • Preparing English and Turkish copies of the tender documents
Monitoring and Evaluation Specialist	<ul style="list-style-type: none"> • Coordinating monitoring and evaluation studies • Preparing monitoring reports to be submitted to WB in a timely manner
Technical Specialist	<ul style="list-style-type: none"> • Providing technical support to the project
Governmental Authorities (both local and national level)	<ul style="list-style-type: none"> • Providing inputs and feedback during the preparation and implementation phases of both project level SEP and sub-project specific SEPs • Participating in relevant stakeholder engagement/consultation meetings
GM Focal Point (PIU)	<ul style="list-style-type: none"> • Acting as the focal point for the GM in the PIU • Keeping records and following up on complaints related to the project • Managing and coordinating the solution process of project-related complaints • Inspecting grievance records for relevant non-compliance issues or recurring issues with stakeholder engagement and other Project activities • Coordinating and monitoring GM contacts at the contractor level • Collecting project-related grievances from all different GM levels • Informing the PIU and management about the solution process • Preparing compiled GM reports related to the project • Monitoring the grievance records of contractors and the resolution process of the grievances and reporting them to the PIU in monthly progress reports • Maintaining contact with the PIU in order to respond to grievances/find solutions
Environmental and Social Specialist of the PIUs	<ul style="list-style-type: none"> • Ensuring that stakeholder engagement is understood by PIU members and other stakeholders • Carrying out the stakeholder engagement activities with identified stakeholders • Organizing/managing Stakeholder Engagement/Consultation Meetings and related events on public information sharing • Supporting other PIU staff who may interact with stakeholders • Supporting the Supervision Consultants and the sub-contractors on the implementation of E&S Documents (ESMPs, SEPs and RPs) • Preparing sub-project specific SEPs in consultation and cooperation with the relevant building management • Supervising the implementation of the Project's environmental and social instruments • Implementing the sub project specific SEPs • Reviewing monitoring reports • Preparing semi-annual reports on the implementation of the environmental and social instruments • Alerting ILBANK management about accidents and incidents • Monitoring and reporting about the social and environmental issues specified in the relevant project specific E&S documents to be implemented throughout the Project.

Supervision Consultant	<ul style="list-style-type: none"> • Ensuring that the project adheres to the methodology and other requirements which are mentioned in E&S Documents (ESMPs, SEPs and RPs) during implementation of sub-projects • Monitoring the contractors' recording and resolution of grievances, and reporting these to PIU in their monthly progress reports • Maintaining contact with the PIU GM Focal Point for the follow up of the grievances
Community Engagement Officers (Contractor)	<ul style="list-style-type: none"> • Monitoring the contractors' recording and resolution of grievances, and reporting these to the PIUs in their monthly progress reports • Maintaining contact with the PIU GM Focal Point for the follow up of the grievances • Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing

7. Grievance Mechanism

7.1. Project Specific Grievance Mechanism (for ILBANK and the Municipalities)

ILBANK has established a transparent and comprehensive GM² in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Project.

Grievance mechanisms will also be established by those municipalities that do not already have GMs in place. All the local GMs will receive, resolve and follow up on issues raised by stakeholder in relation to subproject issues (such as suggestions, complaints, compliments, inquires for information or whistleblower complaints). The GM focal points of the Municipality/Utilities and Community Engagement Officers (CEOs) of the construction contractors will be accessible to all stakeholders and will be responsible to ensure that all requests are handled in a timely and effective manner. The local GMs will be established in line with the Grievance Mechanism described in the ILBANK GM Policy.

The operational flow of Grievance Mechanism for the stakeholders will be as follows:

1. **Dissemination of GM.** Communication and information tools will be prepared to disseminate information about the grievance mechanism. The project stakeholders will be informed regarding the available GM, its intake channels and operational procedures. The communication and informative tools to be developed are listed, but not limited to the followings:
 - a. Web page (ILBANK, PIU, relevant local government authorities)
 - b. E-mail address (ILBANK, PIU, relevant local government authorities)
 - c. Consultation meetings
 - d. Telephone (ILBANK, PIU, relevant local government authorities)
2. **Submission of grievances and requests to ILBANK.** ILBANK includes several uptake channels for its GM.:
 - a. ILBANK website,
 - b. Phone,
 - c. E-mail,
 - d. Brochures and leaflets; and
 - e. Face to face meetings.

² https://www.ilbank.gov.tr/storage/uploads/pagefiles/ilbank_gm_policy_1646748212.pdf

3. **Submission of grievances and requests at the subproject level.** PIUs at the municipal level will establish GMs, with multiple channels for submitting grievance and requests, as listed below:
 - a. Telephone (Call Center and units);
 - b. Personal visit to Municipalities/Utilities or head office/branches of the construction contractor;
 - c. The suggestion/complaint boxes (installed at ILBANK, Municipalities/Utilities or construction sites);
 - d. Through concerned public administrations (district governorship, municipality, mukhtars);
 - e. E-mail;
 - f. Meetings;
 - g. Through staff and local communication desk of Municipalities/Utilities or CLOs of construction contractor;
 - h. By written petition to Municipalities/Utilities or construction contractor; and
 - i. During site visits
4. All the grievances received through the above channels will be collected at the PIU or Construction Contractor level.
5. The grievances received will be recorded into the database by GM Focal Points in the PIUs or the contractors' CLOs.
6. GM Focal Point or CLOs who filed the grievance to confirm the receipt of the grievance by telephone and/or email within 2 days.
7. GM Focal Point or CLOs prepares the draft response and submits it to the approval of the relevant Project Management (GM Team, PIU or Contractor).
8. Following the response, the Grievance Form (Annex-1) will be updated according to the outcome of the process and the complainant will receive the result within 10 working days. If the complaint is valid identifying and taking the required action within 15 working days. With the acceptance of the resolution by the applicant within 30 days, the case is closed. In case the applicant is not satisfied with the response and does not sign the Complaint Form, the GM Focal Point or CLOs will organize a meeting with the PIU management, with the participation of the complainant, associated members of the PIU and the relevant construction contractor. The complainant will his/her concern with the management. The meeting will try to propose another solution to the complainant for the resolution that both parties can agree on.
9. If the complainant is still not satisfied with the outcome of the process, he/she may pursue their complaint through legal channels in the country.
10. A monitoring and evaluation system has been established. The monitoring is recorded in the monitoring and evaluation system.

The most important point in the grievance mechanism is to ensure that all requests are effectively received and recorded in a timely way, responded to and resolved within a predetermined timeline and on the basis of the content of the complaint. This has to be done by the CLOs for the municipality/construction contractor, and proposed corrective/regulatory action has to be acceptable to both parties, or the complainant can pursue legal recourse. Additionally, the mechanism has to allow for anonymous complaints to be addressed and handled, including those related to sexual exploitation and abuse/sexual harassment (SEA/SH).

7.2. Workers' Grievance Mechanism

The workers (direct, contracted, including PIU staff) will be informed about the existence of grievance mechanisms, through notice boards, the presence of "suggestion/complaint boxes" and other means as needed. In addition, the workers' grievance mechanism will be described during the personnel induction trainings to be provided to all project workers. The workers' GM will allow submission of anonymous grievances and requests and these anonymous applications will also be addressed and handled.

The GM Team is established with expert/technical expert and technical group manager under the PMU of ILBANK Department of International Relations includes expert/technical expert and technical group manager.

The Ethics committee (EC) is responsible for investigating all sensitive complaints³ referred by the GM team or by any member of ILBANK PMU staff includes a senior manager, a manager and a staff representative under the Department of International Relations of ILBANK.

The workers grievance mechanism will have same operational flow as defined in *Section 7.1., Project Specific Grievance Mechanism*.

Below intake channels will be available for the project workers if they would like to submit a complaint or a request to ILBANK:

Grievance/Suggestion Boxes	Grievance/Suggestion Boxes will be placed in the Department of International Relations of ILBANK and project sites. These boxes will be made available for all project workers and will be located at convenient places to enable the workers to submit their grievances or requests confidentially and/or anonymously.	
E-mail	etikuidb@ilbank.gov.tr	
Official Letter	ILBANK Department of International Relations, GM Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle / Ankara	
Presidency Communication Center (CIMER) <i>The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities</i>	Webpage	www.cimer.gov.tr
	Call Center	150
	Phone Number	+90 312 525 55 55
	Fax Number	+90 312 473 64 94
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the community relations desks at governorates, ministries and district governorates	
Foreigners Communication Center (YIMER) <i>The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.</i>	Webpage	www.yimer.gov.tr
	Call Center	157
	Phone Number	+90 312 157 11 22
	Fax Number	+90 312 920 06 09
	Mail Address	Republic of Türkiye, Directorate of Communications
	Individual applications at the Republic of Türkiye General Directorate of Migration Management	

The worker complaints and requests will be classified based on their severity, frequency and more importantly sensitivity. Categories of complaints, descriptions and the responsible parties are presented below:

³ **Sensitive complaints** could include the following (not an exhaustive list): **1)** Sexual exploitation and/or any type of abuse by a staff member; **2)** Fraud and/or corruption by a staff member, such as involvement in bribery or misusing funds; **3)** Any action which constitutes a breach of ILBANK code of conduct including staff behavior.

Worker Complaints

<u>Category</u>	<u>Description</u>	<u>Responsible Party</u>
Level 1	When an answer can be provided immediately and/or GM Team and Municipal/Contractor Community Engagement Officers are already working on a resolution	<ul style="list-style-type: none"> • GM Team • Municipal/Contractor • Community Engagement Officers
Level 2	Repeated, extensive and high-profile grievances that may jeopardize the Project or pose reputational risks	<ul style="list-style-type: none"> • GM Team • Municipal/Contractor Community Engagement Officers • Ethics Committee • External Experts (when necessary)

7.3. Management of Sexual Exploitation and Abuse/Sexual Harassment issues

Although the risk from project activities is low, the grievance mechanism shall include handling Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. The GM that will be in place for the project workers will also be used for addressing SEA/SH related issues and will have in place mechanisms for confidential reporting, with safe and ethical documenting of SEA/SH issues.

The project GM will include a channel to receive and address confidential complaints related to SEA/SH, with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher level superior or go directly to the police, as stipulated in the national referral system of the country for dealing such cases. The content and procedures of the project's GM will also have a reporting line on such cases in regard to SEA/SH issues and will be handled under full confidentiality and with the consent of the survivor. If the municipalities will receive a SEA/SH related grievance, these grievances will be decided together with ILBANK GM Team to be directed to national referral systems. All details of the complainant of the sensitive case will be kept strictly confidential. ILBANK Environmental and Social Management System will include a detailed procedure for SEA/SH related grievances.

7.4. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service> . Project affected communities or individuals can also raise their grievances to the World Bank

Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

8. SEP Disclosure and Consultation

The draft SEP has been disclosed through an online stakeholder participation meeting on April 5, 2023 by the ILBANK in order to obtain views and comments of relevant stakeholders.

For the consultation meetings, the following institutions were invited:

1. Ministry of Environment, Urbanization and Climate Change (General Directorate of Environmental Impact Assessment, Permit and Inspection)
2. Ministry of Environment, Urbanization and Climate Change (General Directorate of Local Governments)
3. Ministry of Environment, Urbanization and Climate Change (General Directorate of National Real Estate)
4. Ministry of Environment, Urbanization and Climate Change (General Directorate of Construction Works)
5. Ministry of Energy and Natural Resources (General Directorate of Energy Affairs)
6. Presidency of Union of Municipalities of Türkiye
7. General Directorate of Land Registry and Cadastre
8. Afyonkarahisar Municipality
9. Gerger Municipality
10. Akharım Municipality
11. Emirdag Municipality
12. Sinanpasa Municipality
13. Çubuk Municipality
14. T.C. Ankara Metropolitan Municipality (Ego General Directorate)
15. Gölbaşı Municipality
16. Kecioren Municipality
17. Manavgat Municipality
18. Balıkesir Metropolitan Municipality
19. Bozüyük Municipality
20. Tatvan Municipality
21. Bolu Municipality
22. Bucak Municipality
23. Çankırı Municipality
24. Bekilli Municipality
25. Kayapınar Municipality
26. Elazığ Municipality
27. Kovancılar Municipality
28. Beylikova Municipality
29. Kelkit Municipality
30. Egirdir Municipality
31. Arnavutköy Municipality
32. Silivri Municipality
33. Kahramanmaraş Water and Sewerage Administration General Directorate
34. Karaman Municipality
35. Kastamonu Municipality
36. Kilis Municipality
37. Konya Metropolitan Municipality
38. Selçuklu Municipality

39. Mardin Metropolitan Municipality
40. Yenisehir Municipality
41. General Directorate of Muğla Water and Sewerage Administration
42. Kozaklı Municipality
43. Samsun Metropolitan Municipality
44. Şanlıurfa Water and Sewerage Administration General Directorate
45. Cizre Municipality
46. Tokat Municipality
47. Van Water and Sewerage Administration General Directorate
48. Yozgat Municipality
49. Alaplı Municipality
50. Osmaniye Municipality
51. Ugurludağ Municipality
52. Alanya Municipality
53. Kiğı Municipality
54. Adaklı Municipality
55. General Directorate of Konya Water and Sewerage Administration

At the Stakeholder Engagement Meeting, stakeholders were informed about the Project SEP and the technical, procurement, financial, environmental and social management of the Project. At the end of the meeting, a question and answer session was held and the meeting notes, participant list and photographs are presented in Annex 2.

9. Monitoring and Reporting

Monitoring and evaluation of the stakeholder engagement process is of utmost importance to ensure timely and effective decision making for Project implementation.

Each project specific SEP will include a timeline for engagement activities as well as defining responsible parties for the implementation and monitoring of engagement activities. Monitoring of engagement activities can be realized through identifying key performance indicators that reflect the objectives of the SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase are presented in Table 6.

Table 6. Sample Key Performance Indicators by Project Phase

Project Phase	Indicator	Verification Method
Design and Planning	Preparation of sub-project specific SEPs	# of sub-project specific SEPs prepared
	Public consultation meetings carried out to provide Project information and introduce project documents such as ESMPs and/or RPs	# of meetings conducted # and type of participants attended
	Designated staff appointed to carry out sub-project specific SEP	Statement of staff appointed
	Establishment of Project GM	Official correspondence
Construction	Awareness raising activities carried out throughout the life of the Project	# of meetings held # of people interacted

	# of grievances received due to construction	Decrease in the # of grievances received due to construction
Operation	# of grievances received due to operation	Decrease in the # of grievances received due to operation

The municipalities will be responsible for reporting to ILBANK semi-annually on project progress. Sub-project specific progress reports will also include a section on stakeholder engagement activities conducted and disaggregated data about the grievances during the specified period. Stakeholder engagement activities can be presented in a tabular format listing the tasks undertaken, the time of action, responsible party, target group and the purpose of the action will be presented. The municipalities will inform ILBANK on any changes made to the SEP (if any).

Annex -1 Complaint Form

Public and Municipal Renewable Energy Project	
COMPLAINT REGISTER FORM	
Person Filling the Form:	Date:
Interview Agenda:	Reference No:
1. INFORMATION ABOUT THE COMPLAINANT	
Name Surname <i>(Anonymous applications are also accepted, In case the complaint is submitted anonymously, the feedback regarding the measures taken/to be taken may not be communicated to the complainant. The result of the complaint will be made public on the ILBANK website) :</i>	How to receive the complaint
Turkish ID Number:	Phone <input style="float: right;" type="checkbox"/>
Phone:	Face to face <input style="float: right;" type="checkbox"/>
Address:	Web-site/ E-Mail <input style="float: right;" type="checkbox"/>
E-Mail:	Other (Explain) <input style="float: right;" type="checkbox"/>
Stakeholder Type	
Public Institution <input style="float: right;" type="checkbox"/>	Project Affected People <input style="float: right;" type="checkbox"/>
Private Enterprise <input style="float: right;" type="checkbox"/>	Trade Association <input style="float: right;" type="checkbox"/>
NGO <input style="float: right;" type="checkbox"/>	Interest Groups <input style="float: right;" type="checkbox"/>
Industry Associations <input style="float: right;" type="checkbox"/>	Workers' Union <input style="float: right;" type="checkbox"/>
Media <input style="float: right;" type="checkbox"/>	University <input style="float: right;" type="checkbox"/>
2. DETAILED INFORMATION ON THE COMPLAINT	
Description of the Complaint:	
Resolution method requested by the complainant	
Registered Person Name Surname/Signature	Complainant Name Surname/Signature

Annex -2 Meeting Notes, Participant List And Photographs dated April 05, 2023

Institution	Question/Comment	Answer
Tatvan Municipality	What will be the implementation period of the project? How much time do we need to perform/complete this project?	Implementation period of the Project is planned as 5 years. The process is planned to start after the Loan Agreement is signed and become effective.
	Can we get involved in the project later? If we complete the project within 1 year, will we have any problems with the loan?	Applications to be involved in the Project can be collected until the Loan Agreement is signed with the WB. It is not possible to be involved in the Project at any time in the middle of the 5-years period. Even if the work is completed in the principal grace period, a 5-year principal grace period will be valid and the principal payment will begin at the end of 5 years. If the subproject is finished early, there will be no financial disadvantage.
Kovancılar Municipality	What should we do at the current stage?	ILBANK will be guiding the municipalities throughout the implementation period of the project. At the first stage, feasibility and E&S documents will be prepared in the format agreed with the World Bank. It is important to check the expiry dates of Connection Agreements. For rooftop projects, the seismic resistance of the building needs to be investigated and ensured. Expropriation process must be complied with WB procedures besides Turkish legislation
Silivri Municipality	Is the connection agreement an agreement between the administration and the energy distribution company?	Yes, correct.
Kelkit Municipality	As a municipality, we have a GES project, and some of it has been built and is in use. Remaining part cannot be completed due to lack of finance. Can we get involved in this project for the remaining part?	If the project is an ongoing project, the WB does not finance such projects. If you have a new project application, you can be included in this project.
Bozüyük Municipality	We have a new project apart from the project that our municipality has applied to ILBANK for a loan. Can this project be also included in this loan?	Yes, please forward your requests to ILBANK. Information such as Solar Power Plant subscription type, consumption amount in 2022, if there is an energy transmission line or not, length of the transmission line, etc. should be submitted to ILBANK for preliminary evaluation.
Selçuklu Municipality	We think that we need to speed up our expropriation process within the	It is recommended that for the sub-projects to be included in the project list, the

	scope of the information you have provided about expropriation.	expropriation processes should be completed.
	You stated that the tender process will be subject to the World Bank Procurement Procedures and Principles. As local governments, is it a problem that we are subject to the Public Procurement Law?	Bidding processes will be carried out by local authorities. Since Loan Agreement will be signed between ILBANK and World Bank, ILBANK and our local authorities are subject to the relevant exception clause of the Public Procurement Law in accordance with International Agreements. Therefore, there will be no legal problems to use the World Bank Procurement procedures.

Attendance Sheets

No	Name Surname	Institution	Role	Phone	E-mail
1	Ahmet SARIOVA	Afyon Sandıklı / Akharım Municipality			
2	Mahmut Esat AKSOY	Arnavutköy Belediyesi Strateji Geliştirme Müdürlüğü			
3	Cem BEYHAN	Balıkesir Metropolitan Municipality			
4	Onur ÖZBUDAK	Balıkesir Metropolitan Municipality			
5	Ayhan AKDAŞ	Bingöl Adaklı Municipality			
6	Muhammed Mesut HAŞİMİ	Cizre Municipality			
7	Aysun BOŞÇA	Ministry of Environment, Urbanization and Climate Change (General Directorate of Environmental Impact Assessment, Permit and Inspection)			
8	Öznur AYDIN	Ministry of Environment, Urbanization and Climate Change (General Directorate of Environmental Impact Assessment, Permit and Inspection)			
9	Ahmet GENÇLER	Ministry of Environment, Urbanization and Climate Change (General Directorate of Local Governments)			
10	Mustafa Erhan SAVRAN	Eğirdir Municipality			
11	Handan TAŞKIRAN	Emirdağ Municipality			
12	Nedim ÇOLAK	Gerger Municipality			
13	Betül ATALI	Gölbaşı Municipality			
14	Sema CANKURTARAN	Gölbaşı Municipality			
15	Çetin HURŞİTOĞLU	Kahramanmaraş Water and Sewerage Administration General Directorate			
16	Fatih ŞEKER	Kahramanmaraş Water and Sewerage Administration General Directorate			
17	Fatih ARSLAN	Kahramanmaraş Water and Sewerage Administration General Directorate			
18	Orhan KABA	Kahramanmaraş Water and Sewerage Administration General Directorate			
19	Mehmet Mürşid ACARER	Keçiören Municipality			
20	Kübra TÜRKMEN	Keçiören Municipality			
21	Volkan ALTAN	Keçiören Municipality			

No	Name Surname	Institution	Role	Phone	E-mail
22	Adem EKİNCİ	Kilis Municipality			
23	Yasin İÇAÇAN	Konya Metropolitan Municipality			
24	Hamdi BEKTAŞ	Konya Metropolitan Municipality			
25	M. Fatih ÖZKİŞİ	Konya Metropolitan Municipality			
26	Dursun GÜZEL	Konya Water and Sewerage Administration General Directorate			
27	Alpaslan AKPINAR	Kovancılar Municipality			
28	Serhat TAĞ	Kovancılar Municipality			
29	Erol BİNBİR	Mersin Yenişehir Municipality			
30	Ömer ÇETİNKAYA	Muğla Water and Sewerage Administration General Directorate			
31	Mehmet ÖZKUL	Osmaniye Municipality			
32	Bekir PALTACI	Selçuklu Municipality			
33	Ahmet YÜKSEL	Silivri Municipality			
34	Gülşah Sakin	Silivri Municipality			
35	Mehmet Ali CERRAH	Şanlıurfa Water and Sewerage Administration General Directorate			
36	M. Serkan HASTAOĞLU	Şanlıurfa Water and Sewerage Administration General Directorate			
37	Ufuk ÖKMEN	Tatvan Municipality			
38	Selim ŞAHİN	Van Water and Sewerage Administration General Directorate			
39	Huzeyfe KUŞAN	Van Water and Sewerage Administration General Directorate			
40	İrfan ERKUŞ	Van Water and Sewerage Administration General Directorate			
41	Şule TURAN	Yozgat Municipality			
42	Mehmet F. Klavuz	Ankara Metropolitan Municipality (EGO)			
43	Emre Can	Beylikova Municipality			
44	Şule Alpkoçak	Yozgat Municipality			
45	Ramazan Poyraz	Emirdağ Municipality			
46	C. Düşmez	Afyonkarahisar Municipality			
47	H. Önder	Afyonkarahisar Municipality			
48	Deniz Çelik	Ministry of Environment, Urbanization and Climate Change			
49	Selcen Gördük				
50	Serkan Sözer	Osmaniye Municipality			
51	İlkay Sarı				

No	Name Surname	Institution	Role	Phone	E-mail
52	Sevinç Demir				
53	Peyami				
54	Mustafa Berker	Elazığ Municipality			
55	Esra Turan Tombak	Ministry of Environment, Urbanization and Climate Change - General Directorate of Construction Affairs			
56	Batuhan Aksoy				
57	Neşe	Ministry of Environment, Urbanization and Climate Change			
58	Dicle Maybek				

[illegible]

Zoom Toplantı

ILBANK VC ekranını görüntüyorsunuz Seçenekleri Görüntüle

Görüntüle

ahmet.genciler Yerel Yo... Hamdi Bektaş yasin.icacan Ülker Cem Kapl... Afynkrhşr Bld.... Tatvan Belediye...

Kaydediyor

GÖREV ÇUBUĞUNU GÖSTER GÖRÜNTÜ AYARLARI SLAYT GÖSTERİSİNİ SONLANDIR

0:16:44 14:30

Kamu ve Belediye Yenilenebilir Enerji Projesi

SOSYAL ETKİLER

PAYDAŞ KATILIM PLANI

İller Bankası tarafından uygulanacak olan KABYEP 2. ve 3. Bileşen faaliyetleri için Dünya Bankası'nın Paydaş Katılımı ve Bilgi Paylaşımı başlıklı ve ÇSS10 numaralı çevresel ve sosyal standartlarına göre Paydaş Katılım Planı (PKP) hazırlanmış ve Şubat ayında Dünya Bankası tarafından onaylanmıştır.

https://www.ilbank.gov.tr/storage/uploads/pagefiles/pkp_pumrep_p179867_tr_16789649_07.pdf

www.ilbank.gov.tr

Sonraki slayt

Kamu ve Belediye Yenilenebilir Enerji Projesi

PAYDAŞ KATILIM PLANI

Onaylanmış olan PKP alt projeler için hazırlanacak olan PKP'ler için de bir çerçeve ve temel görevi olacaktır.

İzlenimler PKP'ler proje süreci boyunca yapılacak dokümanlar olduğu için sürekli güncellenecektir.

Not Yok.

Sesi aç Videoyu Başlat Katılımcılar Sohbet Ekran Paylaşımı Kaydet Reaksiyonlar Uygulamalar Çık

Zoom Toplantı

ILBANK VC ekranını görüntüyorsunuz Seçenekleri Görüntüle

Görüntüle

selim.sahin / Van Su y... Beylikova Belediyesi Afynkrhşr Bld. C.DÜŞ... ahmet.genciler Yerel Yo...

Kaydediyor

GÖRÜNTÜ AYARLARI SLAYT GÖSTERİSİNİ SONLANDIR

0:24:33 14:38

Kamu ve Belediye Yenilenebilir Enerji Projesi

ŞİKAYET MEKANİZMASI

ILBANK Uluslararası İlişkiler Departmanı, ŞM Ekibi, aşağıdaki iletişim araçları aracılığıyla şikayet, talep ve dilekleri yönetmektedir.

- Web sitesi: <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararası>
- E-mail: bilgiuidb@ilbank.gov.tr ve etikuidb@ilbank.gov.tr
- Telefon: +90 0312 508 79 79
- Resmi Yazı/Dilekçe Ofisi: ILBANK Uluslararası İlişkiler Departmanı, ŞM Ekibi (mektuplar kişisel veya gizli olarak işaretlenmelidir) - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/ANKARA

Belediyeler de benzer şikayet mekanizması kurup uygulayacaklardır.

www.ilbank.gov.tr

Sonraki slayt

DÜNYA BANKASI YATIRIM PROJELERİNDE İNSANLARIN VE ÇEVRENİN KORUNMASI

Not Yok.

Sesi aç Videoyu Başlat Katılımcılar Sohbet Ekran Paylaşımı Kaydet Reaksiyonlar Uygulamalar Çık

Katılımcılar (64)

Q Katılımcı bul

DC	Deniz ÇELİK (ÇŞİDB)	
DM	Dicle Maybek ÇŞİDB	
DA	Dr. Aysun BOŞÇA-ÇEDİD GM	
E	EROL-PC	
ET	Esra Turan Tombak	
G	Gönenç	
GS	Gülşah Sakin /Silivri Bel	
GZ	Günseli Zeynep ULUG / ILBANK	
HB	Hamdi Bektaş	
HT	HANDAN TAŞKIRAN/EMİRDAĞ BEL..	
I	ILBANK/Deniz KARAER	
I	ilkay.sari	
	...	

Davet Edin Sesimi Aç

Zoom Toplantı

Kaydediyor

Görüntüle

Katılımcılar (44)

Katılımcı bul

OÖ Ozan ÖZDİL

Oİ oznur.aydin (ÇŞİDB)

RP Ramazan POYRAZ

S selcen.gorduk

SŞ selim şahin / Van Su ve Kan. İda...

SA Selin Adıktutlu İLBANK

SS serkan sözer

SB Sunay Bilge/İLBANK

Ş Şule ALPKOÇAK

TB Tatvan Belediyesi Ufuk Ökmen

VA Volkan ALTAN

VI Volkan İdris Sarı

Davet Edin

Sesimi Aç

1/2

amdi Bektaş

Beylikova Belediyesi

yaşin.icacat

Bekir PALTACI (Şelçuklu B...

Dr. Aysun BOŞÇA-ÇET...

94271352075

Şule ALPKOÇAK

Ömer ÇETİNKAYA...

AFYON

Ozan ÖZDİL

CFerah/İLBANK

onur.ozbudak

Mesut Haşimi - Cizre Bel...

Ahmet YÜKSEL-...

oznur.aydin (ÇŞİDB)

Sesi aç

Videoyu Başlat

Katılımcılar

Sohbet

Ekran Paylaşımı

Kaydet

Reaksiyonlar

Uygulamalar

Çık