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| **MERSIN TARSUS AGRICULTURAL PRODUCT PROCESSING ORGANIZED INDUSTRIAL ZONE MANAGEMENT**  **BASIC INFRASTRUCTURE PROJECT**  **STAKEHOLDER ENGAGEMENT PLAN**  **(SEP)** |
| **JULY 2023**  **ANKARA** |

**MERSIN TARSUS AGRICULTURAL PRODUCT PROCESSING ORGANIZED INDUSTRIAL ZONE MANAGEMENT BASIC INFRASTRUCTURE PROJECT**

STAKEHOLDER ENGAGEMENT PLAN

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| A.2 | May 2023 | Onur Ali Taskin | Esra Okumusoglu | Gunal Ozenirler | Turgay Eser |
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| Final Draft | B.0 | July 2023 | Onur Ali Taskin | Esra Okumusoglu | Gunal Ozenirler | Turgay Eser |
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REVISION CODES: A: DRAFT, B: FINAL DRAFT, C: FINAL

**PROJECT NO: 22/016**

**JULY 2023**

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**TABLE OF CONTENTS**

**Page**

*Table of Contents i*

*List of Tables ii*

*List of Figures ii*

*Abbreviations iii*

[EXECUTIVE SUMMARY 1](#_Toc141436974)

[1 INTRODUCTION 2](#_Toc141436975)

[2 ABOUT PROJECT 4](#_Toc141436976)

[2.1 Purpose and Requirements of the Project 4](#_Toc141436977)

[2.2 Project Location 4](#_Toc141436978)

[2.3 Project Organizational Management 6](#_Toc141436979)

[2.1 Roles and Responsibilities 7](#_Toc141436980)

[3 REGULATORY REQUIREMENTS 9](#_Toc141436981)

[3.1 National Legal Framework 9](#_Toc141436982)

[3.2 International Standards 11](#_Toc141436983)

[3.3 Major Gaps between the Turkish EIA Regulation and World Bank's Environmental Assessment Policy 13](#_Toc141436984)

[4 PREVIOUS STAKEHOLDER ACTIVITIES 14](#_Toc141436985)

[5 PROJECT STAKEHOLDERS 17](#_Toc141436986)

[6 STAKEHOLDER ENGAGEMENT TOOLS 19](#_Toc141436987)

[7 INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT DURING THE COVID-19 PROCESS 24](#_Toc141436988)

[8 GRIEVANCE MECHANISM 25](#_Toc141436989)

[8.1 Existing GMs 25](#_Toc141436990)

[8.1.1 GM at National Level 25](#_Toc141436991)

[8.1.2 Project Level Grievance Mechanism 27](#_Toc141436992)

[**8.1.3** **Workers’ Grievance Mechanism** 30](#_Toc141436993)

[9 MONITORING AND REPORTING 34](#_Toc141436994)

[**APPENDIX – A Key Informant Interview** 36](#_Toc141436995)

[**APPENDIX – B Sample Grievance Form** 37](#_Toc141436996)

[**APPENDIX – C Sample Grievance Closure Form** 38](#_Toc141436997)

[**APPENDIX – D Sample Consultation Form** 39](#_Toc141436998)

**LIST OF TABLES**

**Page**

[Table 2‑1. Project Organizational Management 7](#_Toc141436999)

[Table 4‑1. Vulnerable/Disadvantaged Individuals/Groups in the Project Area 15](#_Toc141437000)

[Table 5‑1. Stakeholder Groups 17](#_Toc141437001)

[Table 5‑2. Vulnerable/Disadvantaged Individuals/Groups in the Project Area 18](#_Toc141437002)

[Table 6‑1. Consultation and Information Disclosure Strategy 21](#_Toc141437003)

[Table 9‑1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement 34](#_Toc141437004)

**LIST OF FIGURES**

**Page**

Figure 2‑1. The Project Location 4

Figure 2‑2. The Project Area 5

Figure 2‑3. Organizational Chart of TUIOSB Basic Infrastructure Project 7

**ABBREVIATIONS**

|  |  |
| --- | --- |
| AOI  CİMER  CLO  CRLTAP  EIA | Area of Influence  Presidency’s Communication Center  Community Liaison Officer  Convention on Long-range Trans-Boundary Air Pollution  Environmental Impact Assessment |
| EHS  ESF | Environmental Health and Safety  Environmental and Social Framework |
| ESMP  ESMR | Environmental and Social Management Plan  Environmental and Social Monitoring Report |
| IFC | International Finance Corporation |
| KPI  MoIT | Key Performance Indicators  Ministry of Industry and Technology |
| OHS  OIZ  PAP  PIU | Occupational Health and Safety  Organized Industrial Zone  Project Affected People  Project Implementation Unit |
| PPM | The Public Participation Meeting |
| SEP  TUIOSB  WHO  WB  WBG  YIMER | Stakeholder Engagement Plan  Agricultural Product Processing Specialized Organized Industrial Zone (Tarımsal Ürün İşletme İhtisas Organize Sanayi Bölgesi)  World Health Organization  World Bank  World Bank Group  Foreigners Communication Center (Yabancılar İletişim Merkezi) |

**EXECUTIVE SUMMARY**

The Directorate of Mersin Tarsus Agricultural Product Processing Specialized Organized Industrial Zone (TUIOSB or Project Owner) plans to implement Mersin Tarsus Agricultural Product Processing Specialized Organized Industrial Zone Basic Infrastructure Project (Project). Republic of Turkiye Ministry of Industry and Technology (Implementing Agency) receives technical and financial support from the World Bank (WB).

The project aims to increase the attractiveness of Mersin-Tarsus Agricultural Product Processing Specialized Organized Industrial Zone for investors by providing basic infrastructure. Within the scope of this project; diversion channel, 8.85 km of roads, 8.135 km of potable water line, 9.435 km of treated wastewater line, 5.05 km of storm water line, 3.998 km of wastewater line, 15.370 km of electricity distribution line, 3.581 km perimeter lighting line, 5 distribution centers, 110 lighting poles and 143 LED fixtures, 1 set of SCADA and 1 set of Telecom Infrastructure are planned to be constructed.

The Project is located in Mersin Province, Tarsus District, Kurbanlı and Eskişehir Neighborhoods. The Kurbanlı Neighborhood is located approximately 375 meters south of the Project Area, Sağlıklı Neighborhood approximately 465 meters west and Eskişehir Neighborhood 702 meters east of the Project Area. Also, the quarries operate at nearest 30 meters west of the Project Area. As detailed in Section 5.3 of the ESMP, the total population of the three project-affected neighborhoods is 2040. In addition, there are 59 shareholders affected by the location acquisition.

TUIOSB, which was first planned to be established on an area of 58 hectares in 2018, was later increased to 116 hectares with the additional area approved by the Ministry of Industry and Technology General Directorate of Industrial Zones with the letter dated 4 March 2022 and numbered 3424023. Phase 1 and Phase 2 consisted of 58 hectares each; Phase 1 consisted of 11 parcels and Phase 2 consisted of 9 parcels. Detailed information on land acquisition is presented in the ESMP and EPSA.

This plan defines the purpose of the project, its location, the roles of the parties, institutional management, national and international regulations relevant to the project. The plan then presents the framework for stakeholder engagement and identifies stakeholders and defines ways to communicate with them. The plan also defines the grievance mechanism at different levels.

In order to ensure the operationalisation of the outlined approach, monitoring and reporting sections will also be covered in the plan and will contain sample consultation and grievance forms.

# INTRODUCTION

This plan presents the Stakeholder Engagement Plan (SEP) for “Mersin Tarsus Agricultural Product Processing Specialized Organized Industrial Zone Basic Infrastructure’s Phase 1” (hereinafter referred to as 'Project') and is prepared by 2U1K Engineering and Consultancy Inc. for “Directorate of Mersin Tarsus Agricultural Product Processing Specialized Organized Industrial Zone” (hereinafter referred to as 'Project Owner / TUIOSB'). The Project is located in Mersin Province, Tarsus District, Kurbanlı and Eskişehir Neighborhoods. The Kurbanlı Neighborhood is located approximately 375 meters south of the Project Area, Sağlıklı Neighborhood approximately 465 meters west and Eskişehir Neighborhood 702 meters east of the Project Area. Also, the quarries operate at nearest 30 meters west of the Project Area. As detailed in Section 5.3 of the ESMP, the total population of the three project-affected neighborhoods is 2040. In addition, there are 59 shareholders affected by the location acquisition.

TUIOSB, which was first planned to be established on an area of 58 hectares in 2018, was later increased to 116 hectares with the additional area approved by the Ministry of Industry and Technology General Directorate of Industrial Zones with the letter dated 4 March 2022 and numbered 3424023. Phase 1 and Phase 2 consisted of 58 hectares each; Phase 1 consisted of 11 parcels and Phase 2 consisted of 9 parcels. Detailed information on land acquisition is presented in the ESMP and EPSA.

The purpose of the Stakeholder Engagement Plan is to guide TUIOSB to:

* Build and maintain a constructive relationship with the stakeholders, especially affected communities,
* 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. Promote and provide means for effective and inclusive engagement with all stakeholders and affected parties throughout the project life cycle and to ensure that meaningful environmental and social information is disclosed to such communities and to other stakeholders on issues that could potentially affect them.
* Ensure that appropriate project information on environmental and social risks and impacts is disclosed to all stakeholders in a timely, understandable, accessible and appropriate manner and format.
* Ensure that project-affected communities have inclusive and accessible means to raise issues and grievances, and TUIOSB responds to and manages such issues and grievances appropriately.

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

TUIOSB is committed to implement this SEP throughout all phases of the Project. The SEP is prepared in compliance with World Bank’s Environmental and Social Framework (ESF), Environmental and Social Management Framework of Türkiye Organized Industrial Zones[[1]](#footnote-2) Project and Turkish legislation. SEP is a living document and it will be regularly monitored, reviewed and updated by TUIOSB.

# ABOUT PROJECT

## Purpose and Requirements of the Project

Pursuant to the Organized Industrial Zones Law No. 4562 and the Organized Industrial Zones Implementation Regulation, it is obliged to establish infrastructure as an institution within the legal framework in the approved borders of the Project.

The Project covers the infrastructure manufacturing of the newly established Mersin Tarsus Agricultural Product Processing Specialized Organized Industrial Zone. In summary, the Project aims to increase the competitiveness of companies by improving the investment environment, as well as making a positive contribution to the environment in order to create the technical/physical infrastructure of the TUIOSB and increase its attractiveness for investors.

## Project Location

The Project is planned to be established by the TUIOSB at Mersin Province, Tarsus District, Kurbanlı and Eskişehir Neighborhoods, Evci Creek, Kum Gedigi local at 37°02'45.9" North Latitude and 34°55'18.3" East Longitude.

Map

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Figure 2‑1. The Project Location

The Project Area’ land title deed information are follows; lot 102: parcel no. 5, lot 104: parcel no. 1 and 2, lot 107: parcel no. 3, lot 189: parcel no. 3 and 4, lot 198: parcel no.8, lot 204: parcel no. 1, lot 205: parcel no. 1,2 and 3. The Project Location is presented in Figure 2‑1.

Map

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Figure 2‑2. The Project Area

Kurbanlı Neighborhood is located approximately 500 meters south of the Project Area, Gürlü Neighborhood approximately 1 km north, Sağlıklı Neighborhood approximately 975 meters west, Yeniköy Neighborhood approximately 539 meters east and Eskişehir Neighborhood 958 meters east of the Project Area. The map showing the closest settlements to the Project Area is in Figure 2‑2.

The Project Area is 250 m away from Adana-Aksaray Road (D750) (Old Ankara Road) and connection is provided to Tarsus-Ankara Highway (E90) via the connection located 4.5 km south of the Project Area. There is a connection to Adana-Mersin and Adana-Erdemli Highway from 4.5 km south of the Project Area. In addition to this, the Project Area is 43.4 km from Adana Airport and the related transportation is provided via the Adana-Mersin Highway located in the south of the Project Area by road. The Project Area is 54.5 km from Mersin Port and the related transportation is provided via the Adana-Erdemli Highway located in the south of the Project Area by road. The Project Area is 17.8 km from Tarsus Train Station and the related transportation is provided via the Adana-Aksaray Road, which passes by the Project Area by road.

TUIOSB, which was first planned to be established on an area of 58 hectares in 2018, was later increased to 116 hectares with the additional area approved by the Ministry of Industry and Technology General Directorate of Industrial Zones with the letter dated 4 March 2022 and numbered 3424023. Phase 1 and Phase 2 consisted of 58 hectares each; Phase 1 consisted of 11 parcels and Phase 2 consisted of 9 parcels. There are 59 shareholders affected by the location acquisition. Details are covered in EPSA and ESMP.

The planning studies of TUIOSB was prepared in accordance with the provisions of the Organized Industrial Zones Law No. 4562, the Zoning Law No. 3194, the Regulation on the Production of Spatial Plans, the 1/100,000 scaled Territorial Plan and Plan Provisions of the Mersin-Adana Planning Zone and the OIZ Implementation Regulation.

## Project Organizational Management

The implementing agency of the project is MoIT. The MoIT will provide loans in its capacity as sub-borrower. The General Directorate for Industrial Zones of MoIT is the responsible Project Implementation Unit (PIU), which coordinates general project activities on a daily basis. The PIU includes environmental and social experts with sufficient qualifications and experience to manage the implementation of the ESMP and SEP and related requirements.

**Figure 2‑3.** Organizational Chart of TUIOSB Basic Infrastructure Project

Regarding the implementation of the sub-project, specific personnel with clear boundaries of responsibility and authority will be appointed by OIZ, including management representatives. The Project-specific organizational structure to be developed will include executives, who will coordinate and manage the Project, the Technical and Financial Experts who will be in charge of construction and operational phases of the Project, and at least one Social Expert, one Environment Expert and one OHS Expert. Core environmental and social responsibilities should be well defined and communicated to the relevant personnel and the rest of the Project Management Unit. Additionally, personnel should have adequate knowledge, skills and experience take specific measures and actions required under ESMP.

## Roles and Responsibilities

All environmental and social commitments described in SEP will be fulfilled by the Deputy Zone Manager. The Manager will ensure that all affected parties, especially affected settlements, local community, adjacent facilities, and public bodies in the vicinity are kept informed of the Project. These groups will be involved in the process of identifying key issues under the Project. The general organizational structure for implementation of SEP is presented in Table 2‑1.

**Table 2‑1.** Project Organizational Management

| **Responsible Party** | **Terms of Reference** |
| --- | --- |
| Deputy Zone Manager | * Ensures that this SEP is implemented * Provides necessary resources for effective implementation of this Plan * Coordinates with parties for effective implementation of this Plan |
| Social Expert / CLO | * Ensure that all workers participate in training sessions on SEP, * Maintain a record of training and conduct of awareness sessions for staff to ensure compliance with social and safety commitments stated in ESMP, * Prepare quarterly or semi-annual social monitoring reports for submission to the Lenders, * Adopt and implement the Stakeholder Engagement Plan, and * Manage the worker and public grievance mechanism. |
| Supervisory Consultant | * TUIOSB will appoint a Supervisory Consultant having a range of specialists to inspect the contractor's activities on a daily basis. Apart from the guidance to the given to TUIOSB about WB ESSs and also the public participation and announcement requirements and the project documents in compliance with WB requirements. * The Social Expert will be responsible for supervising the implementation of community health and safety and social measures provided in the Project disclosure package, as well as the implementation of SEP, and for reporting to the Project Owner regularly. Manages the Grievance Mechanism (GM) and regularly monitors the reporting of grievances to the Project Owner. He/she follows the penalties arising from the contract, checks the suitability of the SEP implementation done by the Contractor, gives warnings and directions, and notifies Project Owner in a timely manner if necessary. Participates in stakeholder engagement activities. The expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). The expert is responsible for regularly reporting to the Project Owner. |
| Contractor | * Ensuring that all employees attend training sessions on SEP * Ensure that employees are informed about the grievance mechanism and scope * Recording verbal and written complaints submitted by employees or the public and submitting them to the Project owner on a monthly basis, * Informing employees about complaints that require urgent intervention * To ensure the correct information flow in the monthly reports to be submitted to the Project owner during the construction phase of the Project in order to ensure that the stakeholders can receive information about the project in a transparent manner, * In case of receiving a complaint about sexual harassment/abuse, to convey the issue directly to the Project owner and to ensure the confidentiality of the complainant. * Comply with the contractor management plan * To ensure that the working conditions of the subcontractors it receives service are in compliance with ILO standards. |
| MoIT | * The MoIT will guide public participation and announcement requirements, project documents in compliance with the WB requirements. * MoIT will conduct periodic site visits, and guide TUIOSB about WB ESSs. |
| World Bank | * During the construction and operation phases, the officials from the WB will audit periodically TUIOSB 's performance regarding compliance with the provisions set out in the SEP managed by TUIOSB. |

*Source: https://www.sanayi.gov.tr/sanayi-bolgeleri/dunya-bankasi-finansmanli-osb-kredilendirme-projesi/sf1604010641*

# REGULATORY REQUIREMENTS

## National Legal Framework

**Right of petition, Right to Information and Appeal to the Ombudsperson (Constitution, Article 74)**

“Citizens and foreigner resident in Turkiye, with the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkiye with regard to the requests and complaints concerning themselves or the public. The result of the application concerning himself/herself shall be made known to the petitioner in writing without delay. Everyone has the right to obtain information and appeal to the Ombudsperson. The Institution of the Ombudsperson established under the Grand National Assembly of Turkiye examines complaints on the functioning of the administration.”

**Right to Constitutional Complaint (Constitution, Article 148)**

“Everyone may apply to the Constitutional Court on the grounds that one of the fundamental rights and freedoms within the scope of the European Convention on Human Rights which are guaranteed by the Constitution has been violated by public authorities. In order to make an application, ordinary legal remedies must be exhausted.”1

“Article 24, Appeal process - The applicant whose request for information was rejected may appeal to the Board within fifteen days starting from the official notification before appealing for judicial review. Appeals should be written. The Board shall render a decision within 30 days.”

**Law on the Right to Information (Articles 11)**

“Article 11 - The institutions and agencies shall provide the requested information within 15 working days. However, where the requested information or document is to be obtained from another unit within the applied institution and agency or it is necessary to receive the opinion of another institution or if the scope of the application pertains more than one institution; the access shall be provided in 30 working days. In this case, the applicant shall be notified in writing of the extension and its reasons within 15 working days.”

**The Environmental Impact Assessment Regulation No. 29186 (Article 9)**

1) In order to inform the investing public, to get their opinions and suggestions regarding the project; Public Consultation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.

a) The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.

b) Public Consultation meeting will be held under the Director of Environment or through Urbanization or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.

2) Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.

3) Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.

4) The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.

**Consultative Planning Approach (Public Financial Management and Control Law No. 5018)**

Strategic planning and performance-based budgeting

Article 9- Public administrations; They prepare a strategic plan with participatory methods in order to create their future missions and visions within the framework of development plans, programs, relevant legislation and the basic principles they adopt, to determine strategic goals and measurable targets, to measure their performance in line with the predetermined indicators, and to monitor and evaluate this process.

**Principles of Participation Guide**

Strategy and Budget Department of the Presidency prepares and shares manuals on guidelines for the strategic planning process that public administrations have to implement. One of these guides is about the principles of consultation. The principles of consultation document are a best practice guide for those who design, implement and manage consultations. The Ministry of Industry and Technology acts under the guidance of these guides in large-scale projects and works that require corporate strategic planning and consultation.

**Strategic Plan of the Ministry of Industry and Technology**

MoIT carried out a consultation process in which the opinions of internal stakeholders and external stakeholders were received within the scope of the 2019-2023 Strategic Plan preparation activities. In order to measure the perceptions and get suggestions on forthcoming industry and technology strategies and programs of Turkiye, a comprehensive external stakeholder questionnaire was conducted to of external stakeholders including those working in public institutions and organizations, non-governmental organizations, public institutions, and higher education institutions.

## International Standards

***WB’s Environmental and Social Framework***

The applicable international standard for this Stakeholder Engagement Plan is the WB ESS10. The following items are characteristics of stakeholder engagement: Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation:

* Stakeholder engagement is an inclusive process conducted throughout the project life cycle;
* For the purpose of this ESS, “stakeholder” refers to individuals or groups who: (a) Are affected or likely to be affected by the project (project-affected parties); and (b) May have an interest in the project (other interested parties);
* 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 time frame that enables meaningful consultations with stakeholders on project design;
* Borrowers will engage in meaningful consultations with all stakeholders;
* 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;
* The Borrower will identify the different stakeholders, both project-affected parties and other interested parties;
* The Borrower will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable;
* Depending on the potential significance of environmental and social risks and impacts, the Borrower may be required to retain independent third-party specialists to assist in the stakeholder identification and analysis to support a comprehensive analysis and the design of an inclusive engagement process;
* In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the project and scale of the project and its potential risks and impacts;
* 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 be designed to take into account the main characteristics and interests of the stakeholders, and the different levels of engagement and consultation that will be appropriate for different stakeholders;
* The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities;
* The information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs (such as, disability, literacy, gender, mobility, differences in language or accessibility);
* The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to project their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them;
* The Borrower will continue to engage with, and provide information to, project-affected parties and other interested parties throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project;
* The Borrower will continue to conduct stakeholder engagement in accordance with the SEP, and will build upon the channels of communication and engagement already established with stakeholders;
* If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated;
* The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner;
* The grievance mechanism will be proportionate to the potential risks and impacts of the project and will be accessible and inclusive;
* The Borrower will define clear roles, responsibilities, and authority, as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS.

## Major Gaps between the Turkish EIA Regulation and World Bank's Environmental Assessment Policy

The Turkish EIA procedures are, with some exceptions, in line with the World Bank Policies. The primary exception is the difference between ESS10 and Turkish legislation. ESS10 is more detailed, prescriptive comprehensive than the national legislation. In cases where the Turkish legislation differs from the World Bank Policies, the more stringent one will apply to the implementation of the project. Hence, this SEP is formulated in compliance with ESS10.

# PREVIOUS STAKEHOLDER ACTIVITIES

In previous years, within the scope of the EIA studies, two stakeholder engagement meetings were held on the existing area and the additional area related to the Project.

The public consultation which is related to the Project was conducted on 07.12.2017 at 14.00 o’clock in Tarsus Chamber of Agriculture Presidency Ali Ergezer Meeting Hall. The Public Participation Meeting was announced on 25.11.2017 with an advertisement in Yeni Doğuş newspaper.

At the public consultation meeting held on 07.12.2017, information about the project area, the area where it was established, the workflow chart and process of the facility, possible environmental impacts and measures to be taken were explained with slides. In addition to this, stakeholders' views on the mentioned information were also received.

During the public consultation meeting, it was suggested that adding the location of the area as "Kumgediği" to the name of the project could avoid confusion as there are several OIZs in the vicinity of Tarsus District. This amendment was not implemented as it was not deemed necessary. In addition, the question of who will take part in the Specialized Organized Industrial Zone Enterprising Committee has been addressed and it has been stated that the people who will work in the OIZ should be selected from the region. These issues are evaluated in the EIA Report.

The public consultation, which is related to the additional area, meeting was realized on 08.06.2021 at 14.00 o’clock in Mersin Province Tarsus District Kurbanlı Neighborhood Mosque Terrace Floor. The Public Consultation Meeting was announced on 28.05.2021 with an advertisement in Yeni Doğuş newspaper.

At the public consultation meeting held on 08.06.2021, information about the additional area, distance to settlements, facilities to be located within the OIZ, environmental impacts and measures to be taken, possible environmental impacts and measures to be taken were explained with slides. In addition to this, stakeholders' views on the mentioned information were also received.

Following these meetings, a site visit was carried out on 20.12.2022 - 21.12.2022 and primary data was collected through comminity level interviews, key informant interviews (with headmen of Kurbanlı, Eskişehir and Sağlıklı Neighborhoods) and sensitive receptor interviews in the Project Area. In addition, during the visit, interviews were also held with a nomadic family located on the border of the Project area and former informal resident of the present administrative building of TUIOSB. The information obtained from the interviews generally summarizes the current situation of the neighborhoods and PAP’s. The following topics were selected to discuss the socio-economic indicators of the settlements around the Project area.

The information obtained from the interview summarizes the current situation of the neighborhood in general. The following topics were chosen for discussion of the socio-economic indicators of the settlements around the project area:

* Cultural Heritage,
* Traffic and Transportation,
* Demographics and Population,
* Livelihoods and Employment,
* Education,
* Health,
* Vulnerable/Disadvantaged Individuals/Groups,
* Infrastructure and Services,
* Physical displacement,
* Economic displacement,
* Level of Information about the Project.

The information obtained in this context is given in Chapter 5 of the ESMP. Among these topics, the vulnerable/disadvantaged individuals/groups, which are the key elements within the framework of the stakeholder engagement plan of the project, were identified.

According to the information provided by the headmen of neighborhoods, information about vulnerable/disadvantaged individuals/groups was sought and the groups identified are presented in Table 5‑1.

**Table 4‑1.** Vulnerable/Disadvantaged Individuals/Groups in the Project Area

| **Settlement** | **Individuals over 65 years of age living alone** | **Poor families\*** | **Physically / Mentally disabled** | **Refugee** | **Women Living alone** |
| --- | --- | --- | --- | --- | --- |
| **Kurbanli Neighborhood** | approximately 20 people | approximately 10 households | 2 people | - | approximately 10 women |
| **Eskisehir Neighborhood** | approximately 10 people | approximately 10 households | 1 person | 1 person | between 10-15 households |
| **Saglikli Neighborhood** | unknown number | approximately 15 households | approximately 10 people | 1 person | between 25-30 households |

*Source: Survey study with the headmen, December 2022*

*\* Households, which are depended on social and economic support are defined as Poor Family by headmen.*

In the interview with the family who used to stay in the building that is now used as the administrative building of TUIOSB, the family informed that they had moved to another house of their own in November 2019. They stated that TUIOSB provided furniture and renovation assistance while moving to this house.

The building was built by the family in 1984, but it is not a deeded building. They stayed in this building for years by paying "ecr-i misil[[2]](#footnote-3)". No payment was made for this building other than furniture and renovation assistance. Residents feel that the cost of full renovation was not covered. Please see the Ex-Post Social Assessment (EPSA) document prepared for the Project on this issue.

# PROJECT STAKEHOLDERS

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

It is important that particular effort be made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update. The Stakeholder Engagement Plan has been prepared for this project to identify project stakeholders and establish engagement methods for the future of the Project.

Stakeholder identification has been an on-going process and different issues are likely to concern different stakeholders. Therefore, stakeholders have been grouped based on their connections to the Project. Understanding the connections of a stakeholder group to the Project helps identify the key objectives of engagement. Table 5‑1 presents the interested and affected stakeholders within the scope of the Project.

Table 5‑1. Stakeholder Groups

| **Stakeholder Groups** | **Stakeholder Type** | | | |
| --- | --- | --- | --- | --- |
| **Type of Impact** | **Cause of Impact/interest** | **Affected Party** | **Interested Party** |
| **Internal Stakeholders** | | | | |
| * TUIOSB Personnel; * Contractors and Employees. | Direct Exposure | Project Development, Implementation and  Employment | √ |  |
| **Government / Authorities** | | | | |
| * Ministry of Energy and Natural Resources; * District Governorate of Tarsus; * Provincial Governorate of Mersin; * Mersin Provincial Directorate of Environment Urbanization and Climate Change; * Mersin Chamber of Commerce and Industry; * District Health Directorate of Tarsus; * Ministry of Industry and Technology; * Provincial Directorate of National Education; * Organized Industrial Zones Supreme Organization (OSBÜK). | Indirect Exposure | Relation of the Project with Healthcare, Environmental and Social institutions during construction and operational phases |  | √ |
| **Municipalities** | | | | |
| * Municipality of Tarsus; * Metropolitan Municipality of Mersin. | Direct Exposure | Project Development, Implementation and  Employment |  | √ |
| **Neighborhood[[3]](#footnote-4)** | | | | |
| * Kurbanli Neighborhood; * Eskisehir Neighborhood; * Saglikli Neighborhood. | Direct Exposure | Commissioning,  Potential noise and dust emission during the construction phase | √ |  |
| **Businesses** | | | | |
| * Quarries operating in the region. | Direct Exposure | Commissioning,  Potential noise and dust emission during the construction phase | √ |  |
| **NGO** | | | | |
| * Tarsus Environmental Protection Culture and Art Center Association | Indirect Exposure | The pollution load of the discharged river will be reduced. |  | √ |
| **Vulnerable/Disadvantaged Individuals or Groups[[4]](#footnote-5)** | | | | |
| * Refugees; * Ethnic minority groups; * Individuals over 65 years of age living alone; * Physically or mentally handicapped; * Those who have a chronic illness or are bedridden; * Women heads of households; * Poor people who live on state or association aid; * Nomads. | Direct Exposure | Commissioning,  Potential noise and dust emission during the construction phase | √ |  |

Information on vulnerable and disadvantaged groups was provided in interviews with neighborhoods’ headmen. Groups identified are presented in Table 5 2.

Table 5‑2. Vulnerable/Disadvantaged Individuals/Groups in the Project Area

| **Settlement** | **Individuals over 65 years of age living alone** | **Poor families\*** | **Physically / Mentally disabled** | **Refugee** | **Women Living alone** |
| --- | --- | --- | --- | --- | --- |
| Kurbanli Neighborhood | approximately 20 people | approximately 10 households | 2 people | - | approximately 10 women |
| Eskisehir Neighborhood | approximately 10 people | approximately 10 households | 1 person | 1 person | between 10-15 households |
| Saglikli Neighborhood | unknown number | approximately 15 households | approximately 10 people | 1 person | between 25-30 households |

# STAKEHOLDER ENGAGEMENT TOOLS

A range of tools will be utilized for stakeholder engagement under this Project. Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Project. The project has and will continue to use the following methods for interacting with stakeholders:

* Informal/formal face-to-face or online meetings with affected communities and other stakeholders –can be the main form of consultation throughout the lifetime of the Project. Stakeholders will be informed about these consultation meetings by telephone, brochures, posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties fourteen (14) days in advance.
* Focus group meetings with affected communities and other stakeholders – can be a form of engagement that will support negotiations throughout the life of the Project. It will also provide a suitable environment for stakeholders to express their views.
* Through TUIOSB’s website, phone number and short message service (SMS) –It is a public website created for announcements, documents, reports, etc. – The ESMP and SEP documents prepared for the Project will be published in English and Turkish via the Project website. Information on the application of the grievance mechanism created by TUIOSB will be also announced on the TUIOSB website. At the same time, all up-to-date information about the Project will be made available to the public via the website.
* Written materials – Handbooks, banners, brochures, leaflets, posters, informative booklets, etc. to enable stakeholders to learn about the Project. – Materials will provide information about the Project and inform Stakeholders about all communication methods and stakeholder engagement tools created for the Project. These written materials will be Turkish and also be available in Arabic, in case of need.
* Grievance mechanism – will be open to access of both directly affected or interested stakeholders. A mechanism has been and will continue to be widely disclosed to the affected public.
* Media promotions: Throughout the life of the Project, information disclosure and contact information will be promoted through local and national newspapers and the social media accounts of TUIOSB.

A public consultation meeting will be held before the construction phase of the Project and an additional public consultation meeting will also be planned;

* If there is a recurring grievance on a specific issue,
* If there is a major change regarding the project,
* If there is an intense impact foreseen by TUIOSB,
* If there is extra intensive work in the construction.

All kinds of notifications or complaints from stakeholders during informal/official face-to-face or Internet meetings will be recorded for processing in the mechanism and evaluated within the process of the grievance mechanism. The days and hours of the meetings will be arranged in consultation with the stakeholders, and the highest possible participation will be aimed. A shuttle will be arranged for stakeholders to come to the meetings when necessary, or the responsible people will be at the stakeholders’ location for face-to-face meetings.

Consultation and information disclosure strategy presented in Table 6‑1.

Table 6‑1. Consultation and Information Disclosure Strategy

| **Project Stage** | **Topic of Consultation** | **Method used** | **Timetable: Location and dates** | **Target stakeholders** | **Responsibilities** | **E&S document to be consulted** |
| --- | --- | --- | --- | --- | --- | --- |
| Before Construction | ESMP | Document will be disclosed on Project owner website | Before Construction  Project owner website | All stakeholders | enable stakeholders to review the documents and provide feedback | ESMP |
| Before Construction | SEP | Document will be disclosed on Project owner website | Before Construction  Project owner website | All stakeholders | enable stakeholders to review the documents and provide feedback | SEP |
| Before Construction | ESPA | Document will be disclosed on Project owner website | Before Construction  Project owner website | All stakeholders | enable stakeholders to review the documents and provide feedback | ESPA |
| Construction | Traffic safety | Stakeholder meeting, headman meeting | Two (2) days before possible traffic impact, whenever necessary during the construction | Communities,  Government/Authorities | Consultation about traffic safety and measures adopted by the Project | Transport and Traffic Management Plan |
| Construction | Ensuring safety in emergencies | Stakeholder meeting, headman meeting | Whenever necessary during the construction | Communities,  Government/Authorities | Introducing emergency authorized person, contact information | Emergency Preparedness and Response Plan |
| Operation | Learning the expectations/needs/ grievances of the Associations / Non-Governmental Organizations | Face to Face Meeting | Regularly throughout the operating period. | Associations / Non-Governmental Organizations | Consultations to take place through project operation phase | Stakeholder Engagement Plan |
| Operation | Learning the expectations/needs/ grievances of the residents | Focus Group Meetings | Whenever necessary during the operation | Residents | Consultation will be held periodically. | Stakeholder Engagement Plan  Community Health, Safety, and Security Management Plan |
| Operation | Ensuring safety in emergencies | Stakeholder meeting, headman meeting | Whenever necessary during the operation | Communities | Introducing emergency authorized person, contact information | Emergency Preparedness and Response Plan |
| Operation | Emergency response plan | Brochures, stakeholder meeting, headman meeting | At stakeholder consultation meeting,  When necessary | Communities | Providing information for emergencies | Emergency Preparedness and Response Plan |

While consultations continue throughout the Project, appropriate consultation methods with stakeholders should be ensured particularly with those affected by the Project for vulnerable groups or persons with special needs. Individual preferences should be sought in this regard, and ways to make things easier should be sought. Persons with disabilities and the elderly, as well as female heads of households with special needs, should be monitored throughout their participation in consultations. If they request assistance to participate in consultations, the OIZ should assist the person through the social service units of the municipality. CLO will contact with the stakeholders by phone, e-mail, or sms to learn about the special needs of those affected by the project and the consultation methods they prefer. Consultation methods and channels should be announced on the project company website.

# INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT DURING THE COVID-19 PROCESS

The unprecedented nature of the COVID-19 Pandemic process implies that all elements of Project activities, including stakeholder engagement, can potentially be affected. Given the compulsory restrictions and social distancing measures associated with Covid-19, alternative approaches to stakeholder engagement emerged in the short term. In case of any peak at Covid-19 cases, there are some alternative tools for public participation: brochures, E-mail, notice boards intended for the public, phone interviews and messaging, TUIOSB's website.

# GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism is foremost to give access to a problem-solving procedure to Project affected people including affected communities and project workers. Grievances can be an indication 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 workers, local communities, and other stakeholders.

The structured Grievance Mechanism will ensure that grievances associated with the Project are addressed through a timely, transparent and impartial process. From the early stages of the Project lifecycle, the grievance procedure will be disclosed and will continue to be available to the public and publicized through individual or group meetings, printed materials, notice boards.

The grievances will be received and acknowledged by the PIU assigned by TUIOSB and timeframe for the provision of response or for further consideration will mainly depend on the complexity of the issue raised, however, ideally, it is expected to not exceed 15 days after receiving the grievance.

The methods used to publicize the availability of the grievance mechanism should be culturally appropriate and in accordance with how stakeholders usually acquire information. Women and men may access information differently and it needs to be ensured that both have equal access to information. Stakeholders will be able to share their opinions and grievances via a range of options such as letters, e-mail, grievance boxes, and face to face meetings throughout the Project’s lifespan.

All stakeholders initiating a grievance will have an opportunity to claim their case in a confidential manner. TUIOSB will ensure that the name and contact details of the complainant are not disclosed without their consent.

## Existing GMs

## GM at National Level

Law on the Right to Petition 3071 (1984) and Law on the Right to Information 4982 (2003) form the basis for the Presidential Communication Center (CİMER), the national level grievance mechanism. CİMER operates under the Presidency’s Directorate of Communications and serves as the official state tool to receive requests, complaints, compliments and inquiries for information from the public. The applicants can communicate their requests (such as suggestions, complaints, compliments, inquires for information or whistleblower complaints) to the Presidency through the communication channels given below.

|  |  |
| --- | --- |
| **Webpage** | https://www.cimer.gov.tr |
| https://giris.turkiye.gov.tr/ |
| **Hotline** | Alo 150 |
| **Mail Address** | T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara |
| **Phone** | +90 312 590 2000 |
| **Fax** | +90 312 473 6494 |

Through CİMER, applicants can direct their requests directly to the relevant authorities. If the applicants do not know the respective authority to submit their request, they can submit a request to

CİMER directs the request to the relevant government institution after a preliminary assessment by authorized staff.

CİMER only allows anonymous submissions if the request to be submitted is under the category of a whistleblower complaint. An applicant can submit only one request per day. The requests submitted to CİMER are resolved within 30 days. If the applicants do not receive feedback within this time period, they can re-submit their grievance to CİMER or elevate it to the Ombudsman Institution (www.ombudsman.gov.tr). CİMER only allow applications in Turkish, and it has a detailed manual in Turkish for its users (available at <https://cimer.gov.tr/50sorudacimer.pdf>).

In the second paragraph of Article 9 of the Communication Center of the Presidency Regulation, the obligation to archive the petition is defined as follows: "All information regarding the application and the applicant, the judiciary due to legal disputes that may arise in the future due to the application made archived in accordance with the provisions of Law No. 6698 and the relevant legislation in order to fulfill the requests of the organs and other competent authorities" is stipulated by the phrase "the application shall be recorded by the administration". However, in order to fulfill the burden of proof, applications made verbally or by telephone must be recorded by the administration.

MoIT receives formal requests and grievances through CIMER. Other than CIMER, MoIT can receive formal grievances either as official petitions or through its online web channels. In accordance with the requirements of the World Bank, an expert will be assigned to function as the GM focal point of the project who will receive grievances regarding the project through all available GMs. The GM will also allow submission of anonymous grievances through CIMER. GM focal point of the MoIT will act as the central body in handling complaints by coordinating with OIZ GMs and CIMER.

In addition to CİMER, there is the Foreigners Communication Center/ *Yabancılar İletişim Merkezi* (YIMER) which provides a centralized complaint system for foreigners.

|  |  |
| --- | --- |
| **Webpage** | www.yimer.gov.tr |
| **Hotline** | 157 |
| **Postal Address** | Republic of Turkiye, Directorate of Communications |
| **Phone** | +90 312 5157 11 22 |
| **Fax** | +90 0312 920 06 09 |

## Project Level Grievance Mechanism

Per the World Bank’s ESS10 requirement, a proper grievance mechanism (GM) has been established for the Project and is now operational. For this mechanism to function in a proper and timely manner, a Community Liaison Officer (CLO) who will oversee the entire process has been assigned as a part of the project team of the MoIT. The CLO will also be responsible for reporting the grievance redress process of the project for monitoring purposes. This person will also be responsible to coordinate the grievance mechanism to ensure its smooth functioning within the scope of the project.

As per the GM procedure prepared for the MoIT’s project specific GM, complaints should be reviewed and close in 15 days. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, an urgent safety issue or where it concerns the livelihood of locals.

There are 10 steps that complete the grievance mechanism. This process has been detailed in the text below.

**Step 1:** **Identification of grievance** through personal communication with appropriately trained and advertised by PIU after lodging/submission of a complaint.

**Step 2: Grievance is recorded in the ‘Grievance Log’** (paper and electronic) within one day of identification. The grievance log will managed by the assigned Project Manager. The Grievance Log will also be used to track the status of a grievance, analyses the frequency of complaints arising, typical sources and causes of complaints, as well as to identify prevailing topics and any recurrent trends.

Table 8‑1. List of Data to Be Included in the Grievance Log

| **Grievance Log Database** | * Grievance reference number, * Date of the grievance, * A location where the grievance was received and in what form (for grievance boxes), * Complainant’s contact details (in case of non-anonymous grievances) * Content of the grievance, * Parties responsible for addressing the issue, * Dates when the investigation of the grievances initiated and completed, * Results of the investigation, * Information on the proposed corrective actions to be delivered to the complainant (in case of non-anonymous) and the date of the delivery, * Deadlines for required actions by the personnel, * Indication on whether the corrective action was satisfactory or a reason for non-resolution of the grievance, * The of the close-out, and; * Any outstanding actions for non-closed grievance cases. |
| --- | --- |

The significance of the grievance recorded in the Grievance Log will then be assessed within five to seven days.

Significance Criteria is outlined in the list below.

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

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

Level 2 Complaint: A complaint that is widespread and repeated (e.g., noise from the facilities, dust, etc. ).

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

In the case the complaint is assessed to be out of the scope of the Grievance Mechanism, a grievant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

All complaints will be recorded in the respective Grievance Log with the following information:

**Step 3: Grievance is acknowledged** through a personal meeting, phone call, grievance boxes or letter as appropriate, within a target of 15 working days after submission (except the complaints that require immediate attention). If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

**Step 4: The Project Manager is notified of Level 1, 2 or 3 grievances TUIOSB is notified of all Level 3 grievances.** The senior management of TUIOSB, as appropriate, supports the Project Manager in deciding who should deal with the grievance, and determines whether additional support for the response is necessary.

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

**Step 6: A response is developed** by the delegated team within 15 days in which may include Project Manager with input from senior management of related departments as necessary. The response should identify a suitable resolution to the grievance, in which could involve further information to clarify a situation, taking measures to mitigate problems or compensate for any damages that has been caused during the Project activities though financial compensation.

**Step 7: The response is signed-off** by the senior manager of related departments for level 3 grievances and the Project Manager for Level 2 and Level 1 grievances within 15 days. The sign-off may be a signature on the grievance log or an e-mail which indicates agreement, which should be filed by the Project Manager and referred to in the grievance log.

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

**Step 9: Record the response of the complainant** to help assess whether the grievance is closed or whether further action is needed. The Project Manager should use appropriate communication channels, most likely telephone or a face to face meetings, to confirm whether the complainant has understood and is satisfied with the response.

In case the complaint was made anonymously, a summary of the grievance and resolution should be posted on notice boards located around the Facility as well as within the Project affected villages and Project Manager should contact the head of villages on the anonymous grievances and resolutions as well.

The complainant’s response should be recorded in the Grievance Log including notes on the mitigation measures to prevent recurrence of the grievance in future.

In case the Project Manager or other managerial department are not able to address the particular issue raised through the grievance mechanism Project Manager will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation on how the person that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

**Step 10: Close the grievance with a sign-off** from the Project Manager. The Project Manager assesses whether a grievance can be closed or whether further attention is required. If further attention is required, the Project Manager should return to Step 2 to re-assess the grievance. Once the Project Manager has assessed whether the grievance can be closed, he/she will sign off or seek agreement from the related management departments for level 3 grievances, to approve closure of the grievance. The agreement may be a signature on the grievance log or an equivalent e-mail, which will be filed by the Project Manager and referred to in the grievance log.

#### Responsibilities of Community Liaison Officer

Community Liaison Officer (CLO) is responsible for receiving and resolving grievances. The CLO will be responsible for keeping a record of all requests, complaints and suggestions related to the project and forwarding them to the Regional Directorate and the Board of Directors. The Regional Directorate and the Board of Directors will be responsible for the timely resolution of grievances within 15 working days. The Focal Point of the OIZs will monitor and follow up the GM, as well as inform and report to the MoIT. MoIT PIU is also responsible for receiving and resolving grievances at Ministry level. It is also responsible to monitor the GMs at OIZ, contractor and supervisor levels, and prepare quarterly reports to the World Bank.

* + 1. Workers’ Grievance Mechanism

In addition to project’s GM for its internal and external stakeholders, the ESS 2 and the Labor Management Procedures requires establishment of a Workers’ Grievance Mechanism (WGM) for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace. Worker Grievance Mechanism is defined as the mechanism that receives complaints from Project employees (including both direct and indirect employees).

The contractors will establish and implement a grievance mechanism for the labor force, including subcontractors, prior to the commencement of works. Construction contractors will prepare Labour Management Plans, including a detailed description of the workers' grievance mechanism, before the start of construction works. This mechanism is structured with an intention of it being an effective approach for early identification, assessment and resolution of grievances throughout the Project’s lifespan. The Grievance Mechanism will guarantee that any employee raising a complaint will not be subject to any reprisal.

The scope of the WGM can be summarized but not limited to: any worker with a concern of pertaining to onsite work such as occupational health and safety, terms of employment, wages, issues with the local community or among co-workers, hygiene issues in the common areas, insufficient amount of food and / or concerns regarding the security of the workers.

All Project workers will be informed about the Grievance Mechanism through written and verbal communications. Each worker should be informed about the grievance mechanism at the time they are hired, and details about how it operates should be easily available. And these information can be made available through employee handbooks, notice boards, the presence of “suggestion/complaint boxes”, and other means as needed.

The mechanism will be based on the following principles:

* The process will be transparent and allow employees to raise concerns and lodge grievances;
* There will be no discrimination against those who express grievances and any grievances will be treated confidentially;
* Anonymous grievances will be treated equally as other grievances, whose origin is known; and
* Management will treat grievances seriously and take timely and appropriate action in response.

As listed above, anonymity of the grievance is a critical for the WGM however, during their trainings and induction, the workers will be informed that in case the grievances are lodged anonymously, this may prevent the Human Resources Specialist of TUIOSB providing feedback to the complainant. It is important to note that, Project employees will retain their right to access the project’s grievance mechanism for non-employment-related issues. The labour grievance mechanism will include:

* A procedure for receiving grievances such as comment/complaint form, suggestion boxes, e-mail, telephone hotline;
* Stipulated timeframes for responding to grievances and resolving cases;
* A log sheet to record and monitor the timely resolution of grievances; and
* A department responsible for receiving, logging, handling and following up the resolution of grievances.

The Supervision Consultant will monitor the contractors’ logging and resolution of grievances and report them to the PIU in monthly progress reports. The process will be monitored by the focal point of the OIZs and the GM Focal Point in MoIT.

Although the risk from project activities and in Turkish context is low, grievance mechanism for workers shall include handling disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway will be established and updated in line with existing procedures of the country. 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.

Complaints will be reviewed and closed in 15 days. Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, where it concerns the livelihood of workers.

There are 5 steps that complete the Worker Grievance Mechanism. This process has been detailed in the text below.

**Step 1: Identification of grievance** will be done through personal communication with the Project Manager after lodging/submission of a complaint. This could be in person , by phone, letter, grievance boxes or email.

**Step 2: Grievance is recorded in the ‘Grievance Log’**. Once the grievance is received and recorded, based on the subject and issue, the Project Manager shall identify the department, management or personnel responsible for resolving the grievance.

In the case the complaint is assessed to be out of the scope of the Project’s Grievance Mechanism, a grievant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

**Step 3: Grievance Investigation.** The Project Manager and related departments should then look into the facts relating to the grievance. This should be aimed at establishing and analysing the cause of the grievance and identifying suitable resolution . The analysis of the cause will involve assessing various aspects of the grievance such as the past history of the employee, frequency of the complaint occurrence, management practices, recent incidents, etc.

During the cases when needed, for the sake of the investigation, the Project Manager may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. In case of Site visit is required to gain first-hand understanding of the nature of the complaint, the visit will be also made to verify the validity and severity of the grievance.

The concern will be referred to the related managerial department who will discuss the concern with the employee and Area and/or Departmental Manager.

The investigation phase should be completed in no more than 5 working days of receiving the grievance.

**Step 4: A Resolution and closure is developed** based on the understanding that the Project Manager is developed in consultation with the related departments or management. The suitable resolution for the complaint should be accordingly communicated to the grievant within the 3 working days of the completing the grievance investigation phase.

In case the issue is beyond the scope of the Project Manager, the grievance should be escalated to the Project Management Unit to endeavour to resolve the grievances through managerial levels within the 7 working days of the escalation.

**Step 5: Close the grievance** with a sign-off from the Project Manager once the grievance is resolved and the same has been communicated to the grievant. As the Grievance Log will be updated, the current status of the grievance and understanding of the manner on how the grievance was resolved should also be reported in the Grievance Log. The intention of providing further information on the grievance log is to serve as a reference for any similar grievances that may arise in the future.

In case the complaint was made anonymously, a summary of the grievance and resolution should be posted on notice boards located within the Project Manager and common areas and should be announced through tool-box or weekly meetings.

# MONITORING AND REPORTING

The Project Owner will implement the monitoring activities throughout the lifetime of the Project. This SEP will be updated upon receipt of feedbacks from stakeholders. Communication methods will also be adjusted/updated during the project duration in order to ensure an effective implementation of the SEP. In addition, SEP will be updated in case of major changes that may arise in the scope of the Project.

Monthly monitoring activities will be carried out by Construction Supervision Consultant and TUIOSB, and E&S compliance will be reported regularly to MoIT. MoIT will carry out its supervision monitoring as required and report to World Bank semi-annually on the progress and updates. Monitoring reports will aim to identify environmental, social, OHS related risks and impacts. Grievances will also be included in the monitoring reports.

When MoIT notices any problems in SEP implementation, it will inform the relevant OIZ and agree with them on steps to rectify these problems.

In its semi-annual project progress reports, MoIT will include a section titled “Environmental and Social Standards” which will summarize the status of ESCP and compliance with E&S all framework documents and all sub-project specific plans such as ESIA/ESMP and RPs including, LMP and SEP implementation based on its monitoring activities. The reports will also provide details to all grievances received (if any) during the relevant reporting period, including the number of grievances, dates received, and actions taken and pending/open complaints. Such reports will highlight any issues arising from non-compliance with environmental and social requirements and how it has been/is being addressed from the environmental and social safeguards point of view.

The quarterly reports will also include account of any stakeholder engagement activities (as a separate log carried out during the specified reporting period) carried out along with a summary table of all grievances received and resolved during that reporting period.

Key performance indicators are given in Table 9‑1.

Table 9‑1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

| **No** | **KPI** | **Goal** | **Monitoring Measures** |
| --- | --- | --- | --- |
| 1 | Number and nature of grievances, including the following details:  Gender, category of grievance, status of grievances (closed, pending, resolved), etc. | N/A | Database |
| 2 | Number and nature of grievances responded in the target timeframe of one month | 90% target | Database |
| 3 | Providing feedback to stakeholders on the implementation of the Grievance Mechanism (the number and type of consultations, number of participants, type of stakeholders engaged etc.) | Regular reporting to stakeholders on the results of the Grievance Mechanism | Reporting |
| 4 | Internal audit of the Grievance Mechanism to ensure that the Grievance Mechanism is implemented and that grievances are adequately handled | Annual audit of closing the targeted 90% of the grievances within one month to the satisfaction of the complainant | Inspection Report |

**APPENDIX – A Key Informant Interview**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Form Completed by: | | | | Date and Time: | | |
| Subject of Meeting: | | | | TUIOSB | | |
| 1. **MEETING DETAILS** | | | | | | |
| Interviewed Entity: | | | | Mode of Communication | | |
| Name-Last Name of the Interviewee: | | | | Telephone / Toll Free Number | | |
| Telephone: | | | | Face-to-Face Meeting | | |
| Address: | | | | Website / E-mail | | |
| E-mail: | | | | Other (Describe) | | |
| **Type of Stakeholder** | | | | | | |
| Governmental  Body | PEB | | Private  Enterprise | | Professional Chamber | NGO |
| Focus Groups | Union of Industries | | Labor Union | | Media | University |
| 1. **MEETING DETAILS** | | | | | | |
| Project-related questions: | |  | | | | |
| Project-related concerns/feedback: | |  | | | | |
| Responses to the views provided above: | |  | | | | |

*Recorded by Complainant*  
*Name/Last Name: Name/Last Name:*

*Signature: Signature*

**APPENDIX – B Sample Grievance Form**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Form Completed by: | | | | | Date and Time: | |
| Subject of Meeting: | | | | | TUIOSB | |
| 1. **PARTICULARS OF THE COMPLAINANT** | | | | | | |
| Name-Last Name: | | | | | **Grievance Communicated by:** | |
| TR ID No: | | | | | Telephone /  Toll Free Number | |
| Telephone: | | | | | Face-to-Face Meeting | |
| Address: | | | | | Website / E-mail | |
| E-mail: | | | | | Other (Describe) | |
| **Type of Stakeholder** | | | | | | |
| Governmental Body | PEB | | Private  Enterprise | Professional Chamber | | NGO |
| Focus Groups | Union of Industries | | Labor Union | Media | | University |
| 1. **DETAILED INFORMATION ON THE GRIEVANCE** | | | | | | |
| Description of the grievance: | |  | | | | |
| Solution method requested by the complainant | |  | | | | |
| *Recorded by*  *Name-Last Name/Signature* | | *Complainant*  *Name-Last Name/Signature* | | | | |

**APPENDIX – C Sample Grievance Closure Form**

|  |  |
| --- | --- |
| TUIOSB | |
| 1. **DETERMINATION OF THE CORRECTIVE ACTION** | |
| **1** |  |
| **2** |  |
| **3** |  |
| **4** |  |
| **5** |  |
| **Responsible Departments** |  |
| 1. **GRIEVANCE CLOSURE** | |
| *This section will be completed and signed by the complainant, if the grievance provided in the Grievance Log Form is remediated.* |  |
| *Grievance Closure Date:* | *Grievance Closer's Full Name/Signature:*  *Complainant's Full Name/Signature:* |
| ............./…………/………….. |  |

**APPENDIX – D Sample Consultation Form**

|  |  |  |  |
| --- | --- | --- | --- |
| **Subject of the Meeting** |  | | |
| **Meeting Place** |  | | |
| **Date and Time** |  | **Prepared by** |  |

|  |  |  |
| --- | --- | --- |
| **Number** | **Subject** | **Discussed Issues/Decisions** |
| **1** |  |  |
| **2** |  |  |
| **3** |  |  |
| **4** |  |  |
| **5** |  |  |

**Meeting Photos:**

**Participant List:**

**Documents Shared Ahead of the Meeting:**

1. https://www.sanayi.gov.tr/sanayi-bolgeleri/dunya-bankasi-finansmanli-osb-kredilendirme-projesi/sf1604010641 [↑](#footnote-ref-2)
2. The name given to the compensation received from the person who makes use of an immovable property that does not belong to him/her without a lease contract and constitutes the compensation for the use. [↑](#footnote-ref-3)
3. Population information: The populations of Kurbanlı, Eskişehir and Sağlıklı neighborhoods are 300, 110 and 1,630 respectively. [↑](#footnote-ref-4)
4. [↑](#footnote-ref-5)