

**TÜRKİYE PUBLIC AND MUNICIPAL  
RENEWABLE ENERGY PROJECT  
(PUMREP)**

**ELAZIG MUNICIPALITY**

**SPP (6,454.8 kWp/5,000 kWe)**

**SPP-1 (6,504.6 kWp/4,990 kWe)**

**SPP-3 (6,454.8 kWp/5,000 kWe)**

**SOLAR POWER PLANT PROJECT**

**STAKEHOLDER ENGAGEMENT PLAN**

**MAY 2025**

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## LIST OF ABBREVIATIONS

Aol	Area of influence
CIMER	Presidency's Communication Centre
DC	Distributing center
EHS	Environment Health and Safety
EIA	Environmental Impact Assessment
ELÇED	Elazığ Education and Environment Association
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
E&S	Environmental and Social
ETL	Energy Transmission Line
GBV	Gender Based Violence
GM	Grievance Mechanism
GMCP	Grievance Mechanism Contact Person
FI	Financial Intermediary
IFC	International Finance Corporation
IFI	International Financial Institutions
ILBANK	Iller Bank Inc.
LMP	Labor Management Plan
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organizations
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PAP	Project Affected People
PIU	Project Implementation Unit
PMU	Project Management Unit
PPO	Public Social Organizations
PUMREP	The Turkish Public and Municipal Renewable Energy Project
RE	Renewable Energy
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
TurkStat	Turkish Statistical Institute
WB	World Bank
YIMER	Foreigners Communication Centre

## REVISION HISTORY

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## EXECUTIVE SUMMARY

Türkiye Public and Municipal Renewable Energy Project (PUMREP) (hereinafter the “Project”) aims to support the Government of Türkiye in expanding the use of renewable energy in the public sector, focusing on central government buildings and municipalities. The Project will contribute to the expansion of the Renewable Energy (RE) market in public facilities and take a leading role in the public sector in using sustainable energy solutions to meet the country's carbon emission reduction commitments and increase energy security. PUMREP will support the introduction of RE technologies in municipalities and will be implemented by İller Bankası A.Ş. (ILBANK). ILBANK acts as the Financial Intermediary (FI). The Project aims to reduce the energy consumption cost of public facilities (administrative buildings, water promotion centers and water treatment plants, lighting).

ILBANK has established an Environmental and Social Management System (ESMS) that has been effective on December 24, 2023. The ESMS is aligned with the requirements of World Bank (WB) Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF, and E&S policies and standards of other International Financial Institutions (IFIs) ILBANK collaborates with. It will be applicable to all ILBANK projects and sub-projects financed through International Financial Institutions (IFIs).

The ESMS aims to systematically identify, assess, manage, monitor and report environmental and social (E&S) risks and impacts of projects and sub-projects financed by International Financial Institutions (IFIs). This process should be implemented continuously throughout the loan period in line with the requirements of national legislation, international agreements and conventions ratified by Türkiye, and the E&S standards of the lending IFIs (World Bank for PUMREP). As a critical element of the ESMS, ILBANK has adopted and published an E&S Policy that applies to all ILBANK projects and sub-projects financed through IFIs.

The subproject to be financed under PUMREP includes the installation of a renewable energy facility with an total installed capacity of 19,505.2 kWp/14,990.0 kWe and expected to generate total 30,974,257 MWh of electricity annually by Elazığ Municipality. Solar Power Plant (SPP) Projects of Elazığ Municipality (sub-project) are planned to be realized in lots 549 and 550 of block 110, Şahinkaya Neighborhood, Merkez district, Elazığ province. Elazığ Municipality SPP Projects contains three solar power plants which are SPP (6,454.8 kWp/5,000 kWe), SPP-1 (6,504.6 kWp/4,990 kWe), SPP-3 (6,545.8 kWp/5,000 kWe). The lands where subproject will be located belong to Elazığ Municipality. During the construction phase, a total of 20 workers (including contractors and subcontractors) will work on site during the peak period and no campsite will be set up on site for these workers. During the operation phase, 5 workers will work on site during the peak period and there will be no permanent accommodation for these workers; they will come from outside and work.

This Stakeholder Engagement Plan (SEP) has been prepared to identify all stakeholders, inform them about the sub-project and its potential environmental and social risks and impacts and their interest in the sub-project, and define the procedures and principles to establish effective communication with stakeholders and increase participation. This Plan aims to establish long-term relationships based on mutual trust and transparency between the sub-project and local communities. In addition, it is aimed to reduce the negative impacts that may arise from the sub-project and increase the positive impacts. With the implementation of this SEP, stakeholders will be able to access information about the sub-project, its investments, installation works and operational activities in a timely manner.

This plan includes the legal framework, the process of identifying stakeholders, and the description of the stakeholder engagement program (including the purpose and timing, the proposed strategy for information sharing, the proposed strategy for consultation, future engagement activities, the grievance mechanism covering the receipt and closure of all grievances, the necessary measures to be taken and the management of grievances). In addition, specific engagement and information activities targeting vulnerable groups/individuals identified within the scope of the SEP have been defined.

This SEP is a living document, which will be updated periodically to record consultations undertaken, issues raised, actions taken; to describe lessons learned and any changes to the consultation process; and to outline the schedule for on-going and future interaction. Elazığ Municipality will inform ILBANK on any changes made in SEP.



# 1. INTRODUCTION/PROJECT DESCRIPTION

## 1.1. Objectives

PUMREP aims to support the Government of Türkiye to scale-up RE 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 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. Elazığ Municipality is one of the sub-borrowers and has a sub-project financed under PUMREP. Therefore, this plan is prepared in line with PUMREP's Stakeholder Engagement Plan which is a framework document in order to define the stakeholder engagement process including the grievance mechanism.

PUMREP is financed by the World Bank (WB) to support introducing RE technologies in municipalities. İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI). The RE installations will be primarily used to offset the overall energy consumption from public facilities (i.e. administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills.

The sub-project is classified as Moderate Risk Category in accordance with E&S Risk Screening and Classification by ILBANK in line with ILBANK ESMS and World Bank Environmental and Social Framework (WBS ESF), 2018. One of the tasks within the scope of preparation of subproject specific Environmental and Social Management Plan (ESMP) and a Stakeholder Engagement Plan (SEP) in accordance with ILBANK ESMS, WBS ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye.

This SEP of Elazığ Municipality is an action plan which was prepared for Elazığ Municipality 19,505.2 kWp/14,990.0 kWe Solar (Photovoltaic) Power Plant sub-project and sets out methods for effective communication and interaction with stakeholders.

The ultimate purpose of this SEP is to establish and maintain constructive dialogue between Elazığ Municipality and all stakeholder groups which are project affected people (PAP), other interested parties (OIP) and vulnerable/disadvantaged individuals or groups that are essential for the successful management of the Sub-project. Elazığ Municipality is fully committed to undertaking necessary engagement activities related to sub-projects in a manner that is consistent with international good practice as outlined in next sections.

## 1.2. Components

SEP provides a roadmap for the Elazığ Municipality's engagement with stakeholders and contributes to the achievement of the sub-project objectives and operation of the sub-project in a transparent, inclusive, responsive and cooperative manner. Stakeholder engagement activities will also contribute to environmental and social assessments, by identifying the stakeholders' concerns about the sub-project, thus facilitating the effective solution of these impacts and concerns.

SPP, SPP-1 and SPP-3 facilities will be established as solar power plants within the scope of sub-project activities. SPP and SPP-1 projects will be built on lot 549 of block 110, and SPP-3 project will be built on lot 550 of block 110.

Two transformer centers will be built separately for each SPP project and transformer outputs will be collected at Elazığ SPP DC. It will be transferred from Elazığ Solenterge SPP DC to the existing DC.

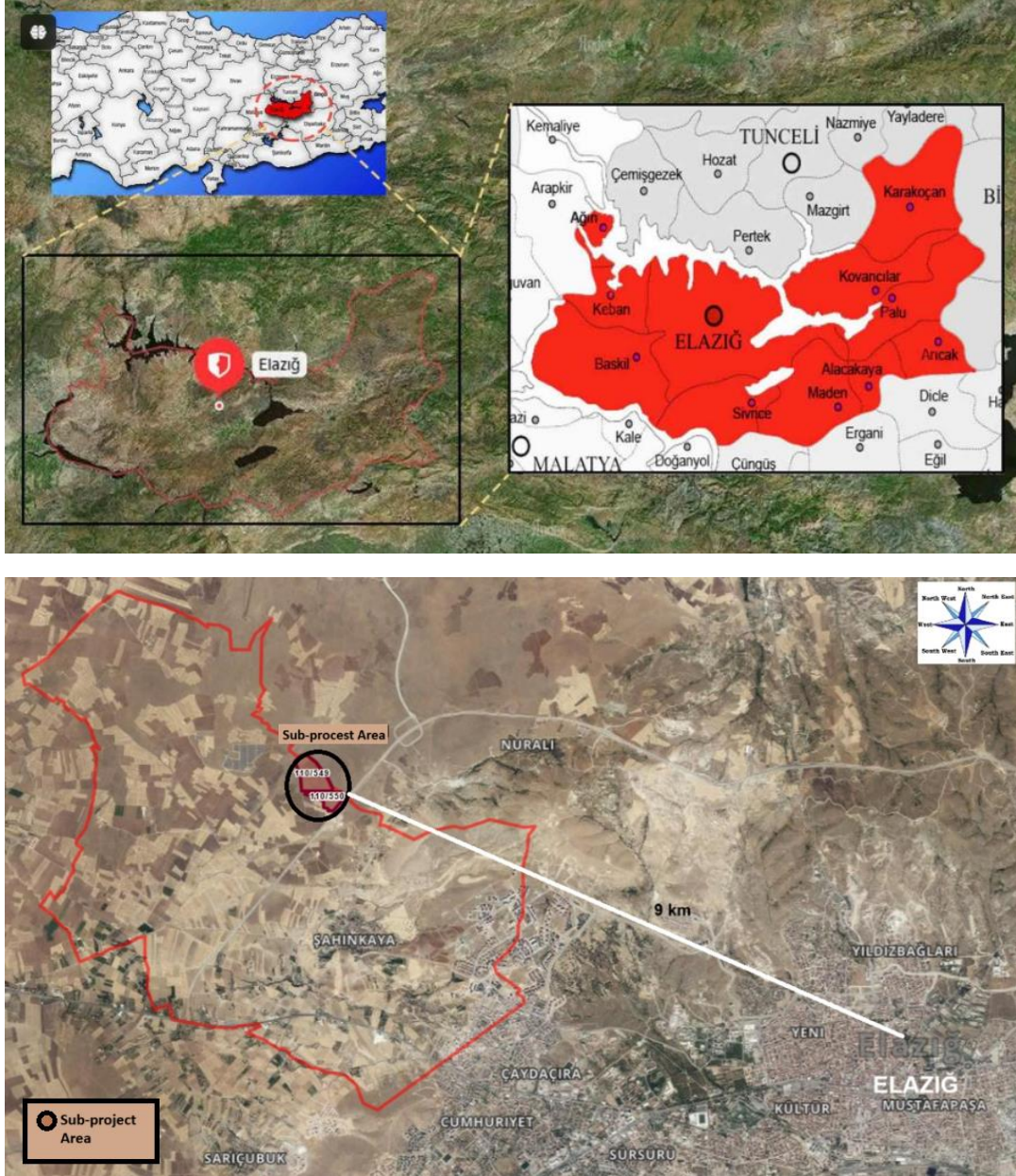
According to the Energy Permit of the Electricity Distribution Company, the ETL will be connected to the existing Solentegre SPP2 TM via underground cable from the Elazığ SPP TM to be constructed on the parcel 110, block 549. The ETL route will be carried 800 meters from the inner boundary of parcel 110, block 486, which is Treasury land in the nature of pasture.

## 1.3. Location

Elazığ Municipality of SEP: 6.454.8 kWp / 5.000 kWe., SPP-1:6.506.5 kWp/ 4.990 kWe, SPP-3:6.454.8 kWp/ 5.000 kWe Solar Power Plant Project is planned to be established in Şahinkaya Neighborhood, Central district of Elazığ Province, lot 518 of block 110. The relevant parcel was divided into lots 549 and 550 by the land division process of Elazığ municipality dated 23.02.2024. The sub-project SPP and SPP-1 are planned in the lot 549 of block 110, SPP-3 is planned in the lot 550 of block 110 (See Table 1). The property belonging to the plot belongs to Elazığ Municipality. The parcels are designated as dry agricultural land according to the land registry.

**Table 1. Location of Sub-project**

Province	Distirct	Neighborhood/ Neighborhood	Block	Lot
Elazığ	Central	Şahinkaya	110	549
				550



**Figure 1. Location of Sub-project**

According to the Energy Permit of the Electricity Distribution Company, the power transmission line will be carried out by moving 800 meters away from the inner border of the lot 486 of block 110, which is Treasury land in the form of pasture. The ETL route is given in the figure (See Figure 2). Regarding the allocation of the energy transmission line route to be passed through the said parcel to the Municipality of Elazığ, an official application was made by the municipality to the Provincial Directorate of Agriculture with the date 22.07.2024 and article 341 and the procedures were initiated. Regarding the route of the energy transmission line and access roads land acquisition is not required.



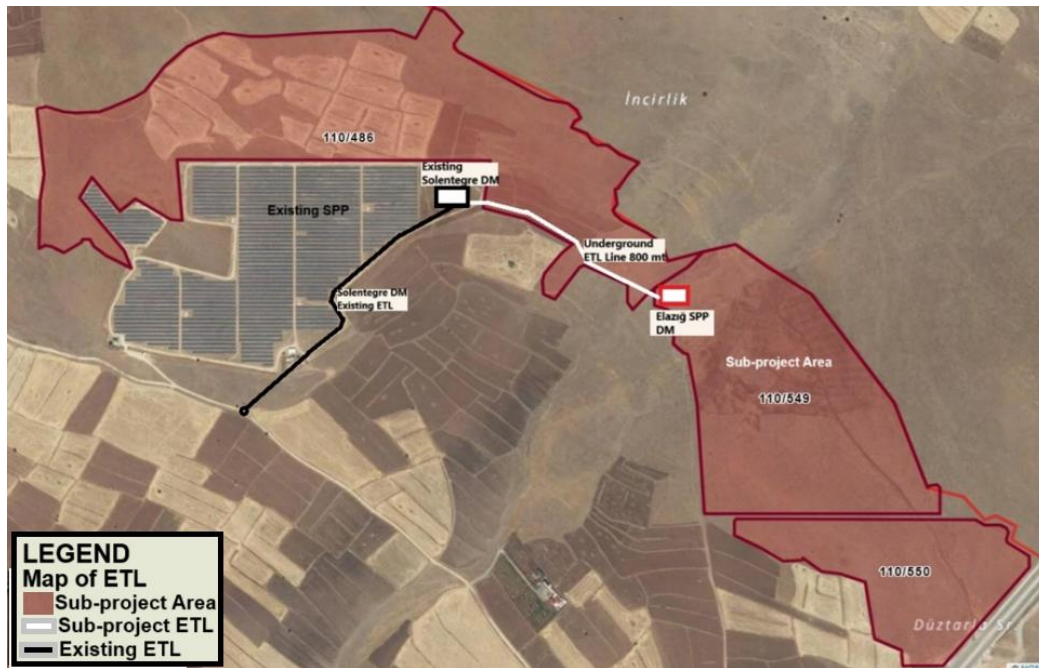


Figure 2. Map of ETL Route

Access to the sub-project area will be carried out from the Elazığ Northern Ring highway. lot 550 of block 110, which is the border parcel to the highway, will be used for transportation to the field. From this parcel, it will be transferred to parcel number 549. The access road within this parcel have been opened by the municipality. The access route is shown in the figure (See Figure 3). There will be no land acquisition for the access road.

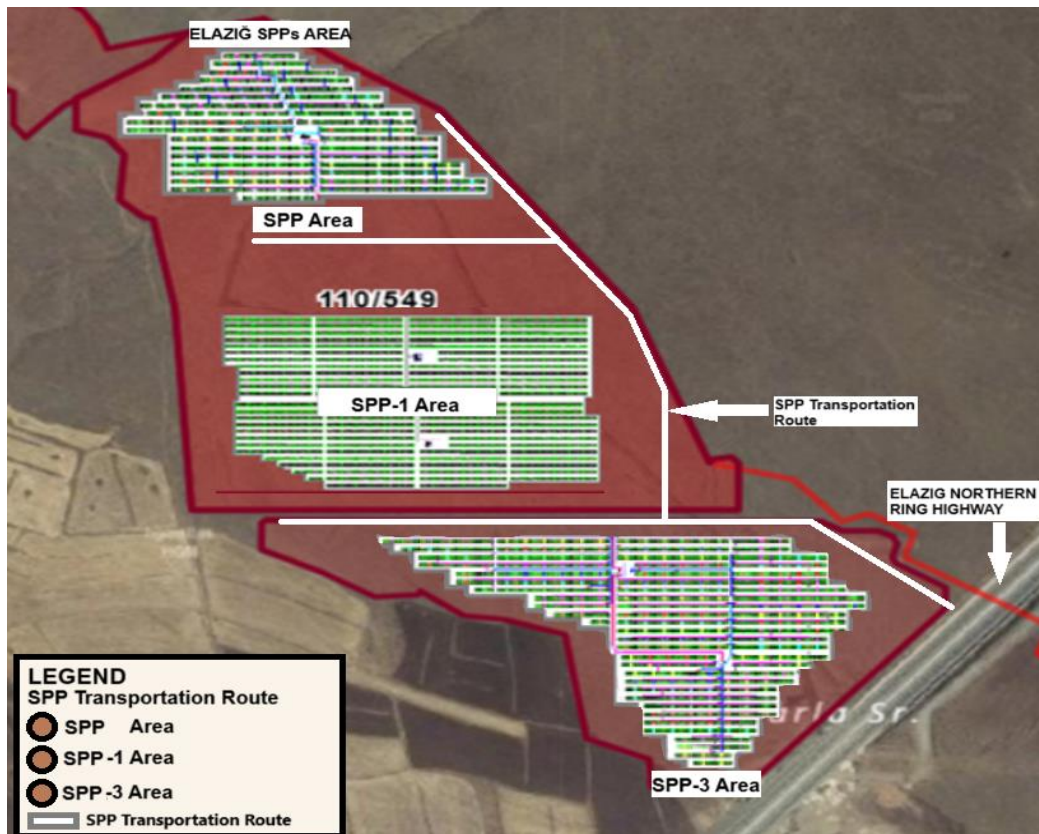


Figure 3. Sub-project Sites Access Route

## 1.4. Area of Influence

According to WB ESS1, “where the project specifically identifies physical elements, issues and facilities that are likely to have an impact, the environmental and social risks and impacts will be identified in the context of the subproject’s Area of Influence (AoI)”. When determining the environmental and social impacts arising from the subproject, the Area of Influence of the subproject has been taken into account. When calculating the environmental and social risks and impacts, for precautionary purposes, 100 meters of the subproject site and 100 meters around the areas where the ETL passes have been determined as the area of influence. The satellite image of the nearest settlement and its distances to the subproject site are given in the figure below (See Figure 4).

The nearest settlement to the sub-project area is Şahinkaya neighborhood, 1.4 km away. In addition, there is another SPP plant operated by private third parties in the vicinity of the sub-project. The SPP plant, located 1 km northwest of the subproject areas and owned by Akfen Company, has a capacity of 8.5 MW and was commissioned in 2016. The ETL of the subproject will be connected to the existing Substation (Solentegre TM) constructed by Akfen Company.

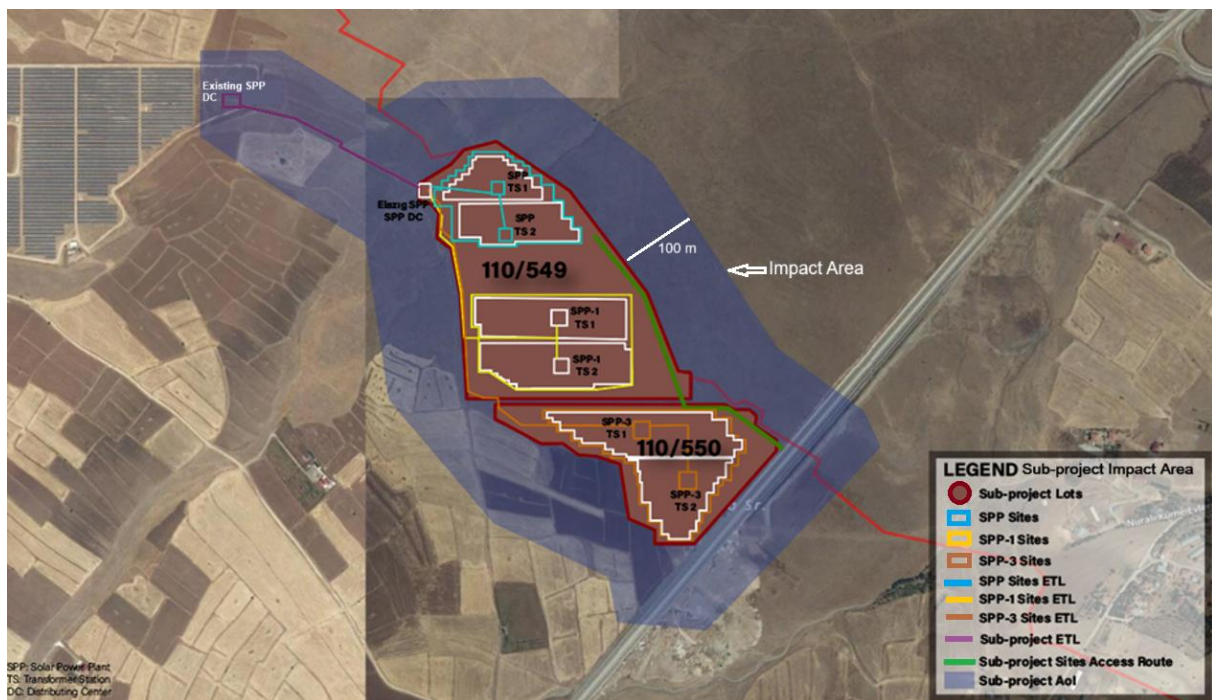


Figure 4. Sub-project Impact Area

## 2. OBJECTIVE/ DESCRIPTION OF SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the subproject.

This SEP has been formulated to ensure that project-affected parties, other interested parties and vulnerable groups that constitute the “stakeholders” are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Sub-Project and its impacts. The objectives of the SEP of Elazığ SPP Project are as follows:

- Helping Elazığ Municipality identify stakeholders, and build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties,
- Assessing the level of stakeholder interest and support for the subproject and to enable stakeholders' views to be taken into account in project design and environmental and social (E&S) performance,
- Promoting and providing means for effective and inclusive engagement with subproject affected parties throughout the subproject life cycle on issues that could potentially create an impact,
- Ensuring that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format,
- Providing project-affected parties with accessible and inclusive means to raise issues and grievances and allow Elâzığ Municipality to respond to and manage such grievances,
- Defining a consultation approach for stakeholders regarding the construction and operation phases of the sub-project, establish and maintain constructive relationships with the local community and other relevant stakeholders.

### 3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

The purpose of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - ("project affected parties") or have an interest in the Sub-project ("other interested parties").

This section summarises the methodological framework for the stakeholder engagement plan and identification of relevant affected groups, and disadvantaged/vulnerable groups relevant to the sub-project.

#### 3.1. Methodology

In order to meet best practice approaches, the subproject will apply the following principles for stakeholder engagement;

- **Openness and life cycle approach:** The public consultation process for the project should be organized throughout the entire life cycle, conducted in an open manner, without external manipulation, interference, coercion or intimidation.
- **Informed participation and feedback:** Information will be provided to all stakeholders in an appropriate format; opportunities will be provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- **Inclusion and sensitivity:** Stakeholder identification will be undertaken to support better communications and build effective relationships during the Project cycle. The participation process for the projects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and project implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable groups that may be at risk of being left out of project benefits and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the Project's stakeholder communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.

Within the scope of this SEP, on 04.11.2024, social expert of the consultant company, made a sit visit and made consultations with mukhtar and residents of Şahinkaya Neighborhood.

### **3.2. Affected parties and other interested parties**

A stakeholder is defined as any person, organisation or group that may be affected by the Sub-Project or has an interest in the sub-project and its impacts.

The term “project affected parties” includes those likely to be affected by the subproject because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

The term “other interested parties” refers to individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups.

According to field visit findings and TurkSTAT data for 2024, the population of Şahinkaya neighborhood is 4,076 people (TurkSTAT 2024). Of this population, 1,959 are male and 2,117 are female.

Other interested parties such as Elazığ Education and Environment Association (ELÇED), academic institutions and local media will be affected to a very low extent by the sub-project.

### **3.3. Disadvantaged/ vulnerable individuals or groups**

Vulnerable groups refer to persons who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status. They can be affected by Sub-Project impacts differently than others and may be limited in their ability to claim or take advantage of sub-project benefits. Therefore, Elazığ Municipality and the Contractor, will apply provisions for assisting disadvantaged or vulnerable individuals that may be more adversely affected by subprojects impacts.

Specifically identified disadvantaged/vulnerable groups and the impacts that these groups are likely to face under the Sub-Project are given below;

- **Households with family members with physical and/or mental disabilities:**
  - Construction activities may disrupt accessibility routes or facilities, limiting mobility and causing inconvenience. There are 3 physically and mentally disabled individuals in Şahinkaya Neighborhood.
- **People with with Illiterate-uneducated**
  - Construction-related activities may affect the access of illiterate and uneducated people to routines. It may cause communication problems and anxiety. They may have difficulty in conveying their complaints, concerns or opinions due to their illiteracy. There are 10 illiterate and uneducated people in Şahinkaya neighborhood.



➤ **Elderly people over 70 living alone and in need of care:**

- Construction activities may disrupt daily routines and access to essential services for the elderly, potentially causing inconvenience or stress. The number of elderly people over the age of 70 who live alone and need care in Şahinkaya Neighborhood is 1 people.

➤ **Households with low or no income:**

- Representatives of households with low income or no income may have difficulty accessing consultation activities. They may have access problems due to financial inadequacies in order to report their complaints or suggestions to consultation activities. The number of households with low income or no income in Şahinkaya Neighborhood is 75 people.

During the site visit, it was determined that there are no migrants or refugees in Şahinkaya Neighborhood, and there are no people who do not speak Turkish.

In the interview with Şahinkaya Neighborhood mukhtar, it was stated that there are no female or child-headed households in Şahinkaya Neighborhood, there are no patients with chronic diseases requiring continuous medical care and there are no individuals in need of care.

Vulnerable and/or individuals and/or disadvantaged groups may have difficulties in participating in consultation activities and events. In order to enable these groups to participate in the consultation meetings, a free shuttle service will be provided for them. These people will be picked up from their homes and returned to their homes after the stakeholder participation activities are completed. For those who cannot attend the consultation meetings, information will be provided through school parent groups or mosque public address systems.

In addition, consultation and information activities will be organized during the winter months for 100 people living in the Şahinkaya neighborhood and working in different cities as seasonal workers for various jobs. The sub-project activities do not have any negative impact on the disadvantaged groups defined above.

Priority will be given to local people in recruitment within the scope of the sub-project. According to the information received from the Şahinkaya Neighborhood Mukhtar's Office, which is the closest settlement to the sub-project area, the information of vulnerable and/or individuals and/or disadvantaged groups is given in the table (See Table 2).

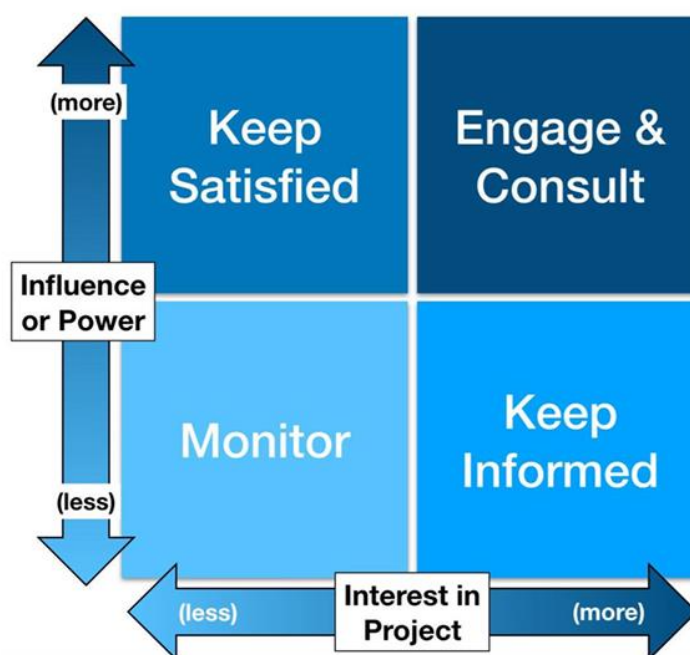
**Table 2. Vulnerable and disadvantaged groups in Şahinkaya Neighborhood**

Vulnerable and Disadvantage Groups	Number of People
Households with family members with physical and/or mental disabilities	3
People with with Illiterate-uneducated	10
Elderly people over 70 living alone and in need of care	1
Households with low or no income	75
Total Vulnerable and Disadvantage Individuals/Groups	89

*Source: Mukhtar Meetings.*

The Stakeholder Influence/Interest Matrix aims to identify, map and prioritize stakeholders. Its scope is to consider the right approach for each. High-influence stakeholders should be satisfied and high-interest stakeholders should be informed. When a stakeholder has both, their expectations need to be managed very closely.

The basic Influence/Interest Graph for stakeholder prioritization is given in figure (See Figure 5). This plotting of the stakeholders' influence and interests will help to focus interactions with them appropriately. All subproject stakeholders will have equal importance in participating in the subproject's stakeholder activities.



**Figure 5. Influence/Interest Graph for stakeholder prioritization**

The position assigned to a stakeholder on the grid indicates the actions to be taken with the stakeholder:

**High-influence, High-involvement Stakeholder (Participation & Consultation):** These stakeholders should be fully engaged and maximum effort should be made to satisfy them and vulnerable/disadvantaged groups/individuals.

**High-influence, Less-involved Stakeholder (Keep Satisfied):** The stakeholders in the upper left corner of the chart are the stakeholders who need to be engaged to satisfy them.

**Low-influence, High-involvement (Inform):** These stakeholders should be adequately informed and communicated with to ensure that no major issues arise. Stakeholders in this category can often be very helpful with sub-project details.

**Low-influence, Less-involved (Watch):** Stakeholders with both low influence and low interest should not be ignored, but more time should be spent communicating with them.

**Table 3. Influence/Interest Table for stakeholder prioritization**

Stakeholder Groups			Level of Interest	Level of Impact
Project Affected Parties	Workforce	Workers to be employed during the construction phase (including subcontractors and third parties' workers)	High	High
	Residents living within the boundaries of the nearest settlement but outside the Aol	Households in Şahinkaya neighborhood	Moderate	Moderate
	Vulnerable/disadvantaged individuals/groups living within the nearest settlement	Households with family members with physical and/or mental disabilities People with with Illiterate-uneducated Elderly people over 70 living alone and in need of care Households with low or no income	Moderate	High
Other Interested Parties(OIP)		Elazığ Provincial Directorate of Environment, Urbanization and Climate Change Elazığ Provincial Directorate of Agriculture and Forestry Elazığ Provincial Directorate of Culture and Tourism Elazığ Education and Environment Association (ELÇED) Firat University Hakimiyet Newspaper	Low	Low

## 4. STAKEHOLDER ENGAGEMENT PROGRAM

### 4.1. Summary of stakeholder engagement done during project preparation

Currently, Elazığ Municipality's communication and consultations with institutions continue, but consultation processes with different stakeholders have not been initiated yet.

### 4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Stakeholder engagement will continue to utilize already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Sub-Project. The Sub-Project has utilized 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 Sub-Project. Stakeholders will be informed about these consultation meetings by telephone, brochures, announcements (posted on noticeboards, advertised in the newspapers, etc.), posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties ten (10) days in advance.
- **Focus group meetings** with affected communities and other stakeholders and sensitive receptors (i.e. hospitals, schools, mosques) – can be a form of engagement that will support consultations throughout the life of the Sub-Project. It will also provide a suitable environment for stakeholders to express their views.
- **Elazığ Municipality's website:** The Elazığ Municipality's website is used for dissemination of announcements, documents, reports, etc. related to Elazığ Municipality's activities and it will also be used for this project as well. The ESMP and SEP prepared for the Sub-Project will also be published on Elazığ Municipality's webpage in English and Turkish. Information on the application of the grievance mechanism created by Elazığ Municipality will be also announced on the website together with the contact details of the GM responsible person. At the same time, all up-to-date information about the Sub-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 Sub-Project and this stakeholder engagement plan.
- **Grievance mechanism** will be open for access by the public.
- **Media promotions:** Throughout the life of the sub-project, information disclosure and contact information will be promoted through local and national newspapers and the social media accounts of the Elazığ Municipality.

A site visit was carried out by the environmental engineer and sociologist of the consulting company on 04.11.2024. Meetings were held with the project affected parties and other interested parties listed below, stakeholders, institutions, organizations and Elazığ Education and Environment Association officials;

-Mukhtar of Şahinkaya Neighborhood,

-Residents of Şahinkaya Neighborhood (20 household representative)

-Elazığ Municipality Environment and Zero Waste Manager and his Officials, Elazığ Municipality staff and Social Expert in PIU,

-Elazığ Provincial Directorate of Environment, Urbanization and Climate Change Environmental Engineer,

-Elazığ Forestry Regional Directorate Forest Engineer

-Elazığ Provincial Directorate of Culture and Tourism Public Relations and Promotional Activities Social Expert

-Member of Elazığ Education and Environment Association,

During the interviews, a study was conducted on the usage status of the sub-project site, the social and economic conditions of the individuals living in Şahinkaya Neighborhood , and the social and environmental positive and negative effects of the sub-project. A "Community Level Research" was carried out by the E&S consultant in order to obtain general information about the socio-economic situation of the Şahinkaya neighborhood and the level of knowledge about the sub-project. (See Annex-F)

Within the scope of the interviews;

- It has been understood that the parties affected by the subproject and other relevant parties have sufficient information about the SPP.
- The subproject area has not been used for commercial purposes, agricultural activities or animal husbandry (animal shelter, grazing, pasture, etc.) before. It has been determined that it is not currently used for any purpose by the municipality, institution, organization or local people.
- Şahinkaya's unemployment rate is below the average of Türkiye. As of the end of 2023, the number of registered unemployed in Şahinkaya Neighborhood was 50, while the female unemployment rate was 48.5% and the unemployed youth Decency between the ages of 18-24 was 29.5%. A significant part of the people registered to İŞKUR in Şahinkaya Neighborhood are people who have professions that do not require qualifications.
- In Şahinkaya, 2750 people are retired, 3950 people are civil servants in the public sector, and 490 people work in the service sector. 120 people earn their living from agriculture and 100 people from animal husbandry.

Table 4 presents stakeholders needs within the scope of the sub-project.

**Table 4. Identification of Stakeholders and their Needs**

Affected Party	Interested Party	Community	Stakeholder Group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, childcare, daytime meetings)
√		Municipality	<ul style="list-style-type: none"> <li>Elazığ Municipality</li> </ul>	Implementation of the subproject	Turkish	Written information, phone, e-mail, face to face	Ensure the implementation of the subproject
√		Şahinkaya Neighborhood	<ul style="list-style-type: none"> <li>Şahinkaya Neighborhood's residents</li> </ul>	Target group of the sub-project	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases
√		Vulnerable/ Disadvantaged Groups	<ul style="list-style-type: none"> <li>Households with family members with physical and/or mental disabilities</li> <li>People with with Illiterate- uneducated</li> <li>Elderly people over 70 living alone and in need of care</li> <li>Households with low or no income</li> </ul>	Individuals with the potential to be more affected by the project activities (especially construction works)	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases
	√	Government / Authorities	<ul style="list-style-type: none"> <li>Elazığ Provincial Directorate of Environment, Urbanization and Climate Change</li> <li>Elazığ Provincial Directorate of Agriculture and Forestry</li> <li>Elazığ Provincial Directorate of Culture and Tourism</li> </ul>	Representing the state side of the project to be realized on behalf of the public	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases
	√	NGO	<ul style="list-style-type: none"> <li>Elazığ Education and Environment Association (ELÇED)</li> </ul>	Creating public opinion on the environmental and social impacts of the subproject	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases
	√	Media	<ul style="list-style-type: none"> <li>Hakimiyet Newspaper</li> </ul>	Informing the public about the subproject	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases

### 4.3. Stakeholder engagement plan

The main goals of the stakeholder engagement program are to inform, disclose and consult on various project documents and activities early on to establish a dialogue with project stakeholders from project planning through implementation and operation. All environmental and social documents prepared in anticipation and in expectation of the financing agreement from the WB will be disclosed and consulted on before project appraisal takes place.

The final decisions regarding the public meetings, locations and timing of the meetings have not been determined yet. Elazığ Municipality will ensure that meaningful engagement and, consultation will be carried out and that project information is disclosed to all stakeholders. Consultation activities are designed with some key guiding principles, including:

- Consultations<sup>1</sup> should be widely publicized, preferably 10 days prior to any meeting or engagement, especially among project-affected parties and other interested parties with an interest in the subproject.
- A non-technical briefing should be provided prior to any event to ensure that people are informed about the assessment and results prior to the planned meetings.
- The location and timing of meetings should be designed to maximize stakeholder participation and compliance.
- The information provided should be clear, non-technical and in all appropriate local languages where necessary.
- Participation should be facilitated so that stakeholders can voice their views and concerns.
- Any issues that arise should be addressed in the meetings or at a later time.

While documenting the stakeholder engagement activities to be carried out within the scope of stakeholder engagement of the sub-project, it will be prepared to cover the following information:

- Date(s) and location(s) of the consultation(s) and related notification(s) (newspaper advertisements, screenshots of social media announcements, etc.)
- Participant details (as per the Personal Data Protection Law),
- Meeting schedule/program (as well as information on what was presented and by whom),
- Summary meeting minutes (comments, questions and responses from presenters),

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<sup>1</sup> The majority of individuals speak Turkish, but Kurdish needs will be taken into account in consultation and information activities through translation services provided by the mukhtars if needed.

- Review of comments, agreed actions, issues requiring follow-up actions, including clarification on how stakeholders are informed about the decisions made.

The proposed Stakeholder Engagement Program is provided in the table (See Table 5).



**Table 5.Stakeholder Engagement Plan**

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	1 Month Period	<b>Information Statement</b> <ul style="list-style-type: none"> <li>General information about the purpose, stages, subproject and E&amp;S impacts/risks</li> <li>Purpose, start date, duration and nature of land preparation, construction and operation activities</li> <li>Preparation of mitigation management plans and procedures regarding social and environmental impacts/risks</li> <li>Grievance Mechanism</li> <li>Information(ESMP and SEP) on Elazığ Municipality website for review</li> </ul>	Public Consultation Meetings Face to face meetings Elazığ Municipality website Social Media Notice Boards Booklets etc. Posters to be hung in mukhtar's office etc.	Resident of Şahinkaya Neighborhood, Government / Authorities,	<ul style="list-style-type: none"> <li>Supervision Consultant,</li> <li>Elazığ Municipality,</li> <li>Subproject Contractor,</li> <li>E&amp;S Consultant</li> </ul>
		<b>Employment and Supply Strategies</b> <ul style="list-style-type: none"> <li>Hiring employees</li> <li>Staff training</li> <li>Purchasing materials and services</li> <li>Grievance Mechanism</li> </ul>	Public Consultation Meeting Elazığ Municipality website Social Media Notice Boards Booklets etc. Posters to be hung in work areas etc.	Resident of Şahinkaya Neighborhood,	
Construction	4 Month Period	<b>Information Statement</b> <ul style="list-style-type: none"> <li>Monitoring targets and activities to be carried out</li> <li>Monitoring targets and activities and regular reporting of monitoring results to stakeholders</li> <li>Implementation of mitigation measures related to relevant social and environmental impacts/risks</li> <li>Grievance Mechanism</li> </ul>	Public Participation Meeting Elazığ Municipality website Social Media Notice Boards Booklets etc. Posters to be hung in work areas etc.	Resident of Şahinkaya Neighborhood, Government / Authorities,	<ul style="list-style-type: none"> <li>Supervision Consultant,</li> <li>Elazığ Municipality,</li> <li>Subproject Contractors,</li> <li>E&amp;S Consultant</li> </ul>
		<b>Traffic and Transportation Management</b> <ul style="list-style-type: none"> <li>Road safety awareness, including safe passage through bypasses and connecting roads</li> <li>Types, number and frequency of vehicles to be used during construction</li> <li>Collaboration with Şahinkaya Mahalle residents, muhtars and responsible authorities to improve signage, visibility and general road safety, especially along roads near schools or other places where children are present,</li> </ul>	Face-to-face meetings, Depending on the demands of the stakeholder group, Posters to be hung in work areas, etc., Elazığ Municipality website	Resident of Şahinkaya Neighborhood,	

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		<ul style="list-style-type: none"> <li>• Planning and timing of construction activities on roads,</li> <li>• Providing education in collaboration with Şahinkaya Neighborhood residents on traffic and pedestrian safety (e.g. school education campaigns))</li> <li>• Traffic measures and sub-project road use sharing with mukhtar</li> <li>• Grievance Mechanism</li> </ul>			

#### **4.4. Reporting back to stakeholders**

Stakeholder engagement is a continuous process that begins before the development of the SEP and will continue throughout the life of the sub-project. Elazığ Municipality will actively communicate with the identified stakeholders throughout the life of the sub-project. In particular, Elazığ Municipality will solicit feedback from stakeholders on the E&S performance of the subproject and the implementation of the identified mitigation measures and the Grievance Mechanism. In the event of significant changes in the subproject that lead to risks and impacts that will particularly affect the parties affected by the subproject, Elazığ Municipality will provide information on these risks and impacts and consult with the parties affected by the sub-project on how to mitigate these risks and impacts.

Different information methods and tools can be used to increase the level of information for each of the targeted stakeholder groups. In particular, for public participation meetings, the meeting place(s), time and date will be set and this information will be announced to the public at least 10 days before the event, ensuring that all community members are informed about the event to be held.

PMU will take special measures to ensure that vulnerable and disadvantaged individuals/groups have equal opportunities to access information, provide feedback or raise complaints. Appointing a public communications, social and citizen engagement expert will help ensure access to all project affected parties.

Some of the strategies to be adopted to effectively interact and communicate with vulnerable/disadvantaged individuals/groups will be to:

- Conduct targeted consultations with vulnerable/disadvantaged individuals/groups within the Elazığ Municipality to understand their concerns/needs regarding access to information, facilities and services supported by the sub-project and other challenges they face in their homes, workplaces and communities.
- To reach these groups, identify leaders and organizations of vulnerable/disadvantaged individuals/groups,
- Create a database of marginalized groups through existing sector associations such as disability organizations,
- Engage community leaders, Public Social Organizations (PPOs) and NGOs working with vulnerable/disadvantaged individuals/groups, and organize face-to-face focus group discussions with these populations when appropriate.

Awareness raising and stakeholder engagement with vulnerable/disadvantaged individuals/groups will be conducted in a way that takes into account their specific sensitivities, concerns and cultural sensitivities to ensure they fully understand the sub-project activities and benefits.

In addition, the timing of these events for stakeholders who are working will be arranged in a way that they can also participate in the consultation events or alternative solutions will be produced for them. The following additional support or resources will be provided for these people to participate in stakeholder engagement activities. The following measures should be taken at this point:

- Providing written materials related to sub-project information in larger fonts and Braille,
- Selecting accessible venues for consultation events and/or providing transportation for people in remote areas ,
- Organizing small events or meetings for vulnerable/disadvantaged people depending on their sensitivity (e.g. a small meeting with hearing impaired individuals accompanied by a sign language expert),
- Organizing events/meetings or consultation processes with vulnerable/disadvantaged individuals/groups in cooperation with relevant NGOs (if any) (e.g. organizing a meeting/event for the physically disabled with the help of the Solidarity Association for the Physically Disabled),
- The timing of the consultation events should be arranged in a way that working stakeholders can participate.

For those who are unable to attend despite the scheduled time, brochures, an active web page, social media, face-to-face individual meetings, etc. can be organized.

Throughout all stages of the project, comments collected through the website, grievance mechanism, and all stakeholder engagement activities such as public and/or individual meetings will be subject to evaluation and review by the relevant responsible personnel such as the GM Contact Person (GMCP) and the Public Relations Assistant to be assigned by the Project Management Unit (PMU).

The contractor and Elazığ Municipality officials will be in regular contact. Face-to-face meetings will be held when necessary, and the contractor and Elazığ Municipality will meet periodically (monthly).

Depending on their content, comments will be evaluated and reviewed both within the PMU and by the relevant responsible personnel of the contractor(s).

If the request or comment cannot be met with the solution method proposed by the commenter or requester to resolve the grievance, alternative solutions will be sought (see Section 6 for more details). A decision will be made as a result of the evaluations and if the final decision cannot be met within a reasonable time frame, it will be communicated to the stakeholder(s) who made the comment or request, together with the justifications and the timeline of actions related to the comment/request. If the comment is not anonymous, the final decision will be communicated to the stakeholder(s) through the communication channel(s) preferred by the stakeholder(s). In addition, a Grievance Closure Form (see Annex-B) should be filled in and signed by the stakeholder(s).

Stakeholders will be informed as the sub-project develops, including reporting on the environmental and social performance of the sub-project, implementation of the SEP and the grievance mechanism.

During the construction phase, voice announcements will be made by Elazığ Municipality and/or Contractors two (2) days in advance for road restrictions, water cuts and other infrastructure service limitations. Environmental and social performance indicators will be shared with stakeholders monthly via Elazığ Municipality's website<sup>2</sup>.

The commencement and completion of the construction activities of the sub-project, changes in the sub-project design and important stages such as commissioning will be communicated to stakeholders through local media channels as much as possible.

According to the Environmental and Social Management Plan prepared for Elazığ Municipality's sub-project, after the finalization of the ESMP, a consultation meeting is required to be held with the all stakeholders that are determined during the stakeholder identification phase.

The (SEP) has been prepared to identify all stakeholders and their interests in the sub-project and to define the procedures and principles required to establish effective communication with stakeholders and improve participation. This Plan aims to establish long-term relationships based on mutual trust and transparency between the sub-project and local communities. With the implementation of the SEP, stakeholders will have timely access to information about the sub-project, its investments, installation works and operational activities. The data will be fully understandable to the targeted groups and access to consultation venues will be possible for everyone.

This SEP also aims to identify vulnerable groups and ensure that they are included in the ongoing consultation and participation process, ensuring that all relevant parties are included in the process and that no group is excluded. In this context, the SEP aims to be a useful tool for managing communication between the sub-project and its stakeholders.

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<sup>2</sup> <https://www.elazig.bel.tr/>

## 5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

### 5.1. Project Implementation Unit (PIU)

PIU will be established within Elazığ Municipality. The duties and responsibilities of PIU are explained in table (See Table 6).

The contact information of the responsible personnel is given below:

Company/ Institution	Profession/ Expertise
Elazığ Municipality	Environmental Expert
Elazığ Municipality	OHS Expert
Elazığ Municipality	Social Expert
Elazığ Municipality	Environmental Expert
Elazığ Municipality	Human Resource Expert

But the phone number, address, e-mail address, title, etc. Contact information may be updated in the future.

### 5.2. Resources

Elazığ Municipality is ultimately responsible for the environmental and social performance of the entire sub-project, including the performance of its own contractors and other contractors. The Project Implementation Unit (PIU) will be established to carry out operational and administrative tasks.

A sufficient budget will be allocated for the communication and complaint resolution mechanism to be established with stakeholders. The budget is included in the project budget.

### 5.3. Management functions and responsibilities

Elazığ Municipality/PIU will be the main party responsible for the implementation and management of the SEP and Grievance Mechanism. In addition, Elazığ Municipality PIU will be responsible from coordination with contractors, implementation, monitoring and reporting. The expert to be assigned may be personnel who meets the appropriate qualifications within the existing organizational structure of Elazığ Municipality or may require new employment. The final responsibility for the implementation of the SEP belongs to Elazığ Municipality.

Elazığ Municipality/PIU will be responsible for the execution of the stakeholder engagement activity. Detailed roles and responsibilities for stakeholder participation in the subproject are provided in table (See Table 6).

**Table 6.Responsibilities**

Responsible Party	Roles and Responsibilities
Elazığ Municipality(PIU)	<ul style="list-style-type: none"> <li>• Implementation of this SEP,</li> <li>• Planning and implementing SEP activities in close cooperation with ILBANK PMU,</li> <li>• Reporting Elazığ Municipality's SEP-related activities to ILBANK Board of Directors,</li> <li>• Accessing PAPs/stakeholders for site-specific sub-project issues,</li> <li>• Reporting to ILBANK PMU on the implementation of SEP activities,</li> <li>• Proper implementation of the grievance mechanism defined in the SEP, and</li> <li>• Informing ILBANK PMU on the general status of implementation.</li> </ul>
Elazığ Municipality(GMCP)	<ul style="list-style-type: none"> <li>• Leading stakeholder engagement activities in close collaboration with the ILBANK PMU,</li> <li>• Act as a focal point for the GM in the PIU,</li> <li>• Keep records and monitor sub-project-related grievances,</li> <li>• Manage and coordinate the resolution process of sub-project related grievances,</li> <li>• Review grievance records for relevant non-compliance issues or recurring issues related to stakeholder engagement and other sub-project activities,</li> <li>• Coordinate and monitor PIU contacts at the contractor level,</li> <li>• Inform PIU and management about the resolution process,</li> <li>• Prepare compiled PIU reports on the sub-project,</li> <li>• Monitor contractors' complaint records and complaint resolution process and report to PIU in monthly progress reports,</li> <li>• Maintain communication with PIU to respond/resolve grievances,</li> <li>• Consultation on specific SEP activities;</li> <li>• Reporting on implementation of SEP activities to ILBANK PMU,</li> <li>• Executing defined grievance mechanism in the SEP properly and informing ILBANK PMU about the overall implementation status.</li> </ul>
E&S Consultant	<ul style="list-style-type: none"> <li>• Providing the necessary information to Elazığ Municipality,</li> <li>• Conducting an information and public participation (ESMP introduction) meeting for the public and NGOs,</li> <li>• Updating this SEP in line with the concerns/views of the Sub-project stakeholders and,</li> <li>• Finalizing the reports as per the concerns/opinions of the stakeholders.</li> </ul>
Supervision Consultant	<ul style="list-style-type: none"> <li>• Ensure that the project complies with the methodology and other requirements specified in the E&amp;S Documents (ESMP and SEP) during the implementation of sub-projects,</li> <li>• Recording and monitoring the resolution of grievances from contractors and reporting them to Elazığ Municipality (PIU) in the monthly progress reports,</li> <li>• Maintaining communication with PIU GM Focal Point for follow-up of complaints,</li> <li>• Communicating with Elazığ Municipality (PIU) GM Focal Point for follow-up of grievances.</li> </ul>
Contractor	<ul style="list-style-type: none"> <li>• Inform Elazığ Municipality on any issues related to engagement with stakeholders;</li> <li>• Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by Elazığ Municipality;</li> <li>• Inform ILBANK PMU and Elazığ Municipality on important construction activities (such as road closures and service</li> </ul>

Responsible Party	Roles and Responsibilities
	<p>interruptions) and of any issues related to their engagement with stakeholders;</p> <ul style="list-style-type: none"> <li>• Maintaining contact with the Elazığ Municipality GM Focal Point for the follow up of the grievances,</li> <li>• Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing,</li> <li>• Informing local communities of any environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.),</li> <li>• Developing and implementing a grievance mechanism both for the E&amp;S performance of the sub-project and for their workforce including sub-contractors, prior to the start of works in compliance with Elazığ Municipality's GM requirements.</li> </ul>



## 6. GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The purpose of the public grievance mechanism and the workers grievance mechanism is to provide access to a grievance resolution procedure for Subproject affected people, including communities and Subproject workers. Managing, preventing, minimizing and effectively addressing grievances is an integral part of a robust stakeholder engagement strategy. 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 Sub-Project worker's, local communities, and other stakeholders. Participation also helps to anticipate and review community concerns and prevent them from turning into grievances. Therefore, according to the WB, the following Grievance Mechanism (GM) will be implemented by Elazığ Municipality/PIU throughout the life of the sub-project, including pre-construction, construction and operation phases. In the GM, comments/grievances will be received in Turkish, since everyone in the developed settlements speaks Turkish, there will be no need to use another language. The grievance channels used in applications will be published in Turkish. GM forms and consultation records will be kept in Turkish.

### 6.1. Grievance Mechanism at National Level

**Presidential Communication Center:** The Presidential Communication Center (CIMER) provides a centralized complaint system for Turkish citizens, legal entities and foreigners. The Presidential Communication Center (CIMER) will serve as an alternative and well-known channel through which Project stakeholders can directly communicate their complaints and feedback regarding the Project to government officials.

#### **Presidency's Communication Centre (CIMER)<sup>3</sup>:**

- **CIMER Website:** [www.cimer.gov.tr](http://www.cimer.gov.tr)
- **CIMER Call Centre:** 150
- **CIMER Phone Number:** +90 312 525 55 55
- **CIMER Fax Number:** +90 0312 473 64 94
- **Address for Official Letter:** Republic of Türkiye, Directorate of Communications Kızıllırmak Mah. Mevlana Bulvarı No:144 ÇANKAYA/ANKARA
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the community relations desks** at governorates, ministries and district governorates

**The Foreigners Communication Centre (YIMER)** has been providing a centralized complaint system for foreigners:

- **YIMER Website:** [www.yimer.gov.tr](http://www.yimer.gov.tr)
- **YIMER Call Centre:** 157
- **YIMER Phone Number:** +90 312 5157 11 22

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<sup>3</sup> For details please see: <https://www.cimer.gov.tr/50sorudacimer.pdf>

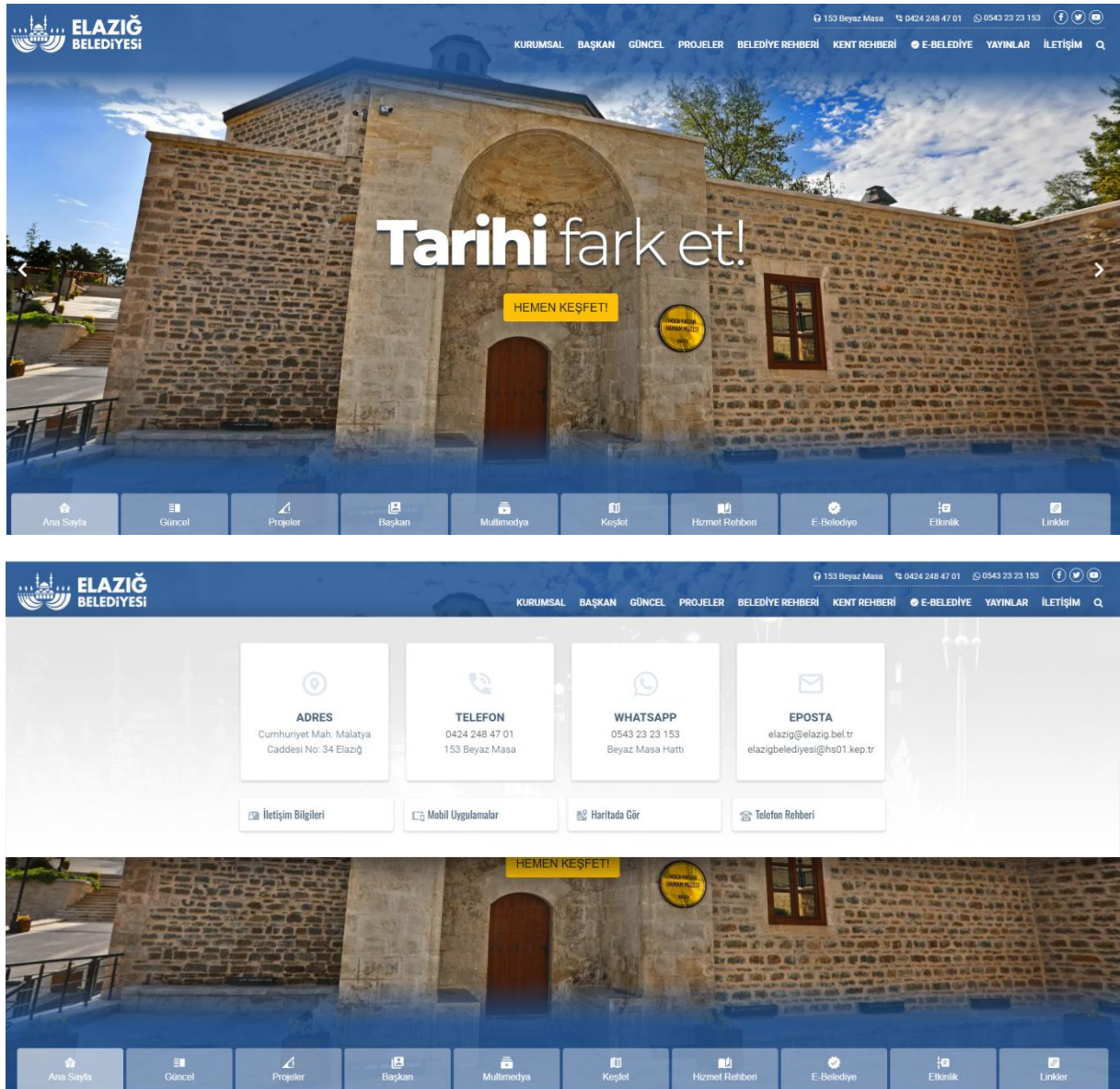
- **YIMER Fax Number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the Republic of Türkiye General Directorate of Migration Management**

## 6.2. Sub-Project Level Grievance Mechanism

As part of the stakeholder participation, information and consultation process, an effective and accessible grievance mechanism is required to be established. The purpose of the grievance mechanism is to provide channels free from manipulation, coercion and intimidation through which local community members can submit their demands, concerns and complaints regarding the sub-project and its impacts. Responding to and resolving complaints in a timely, proactive, impartial, effective and efficient manner is essential according to international standards and requirements regarding stakeholder participation. In particular, it provides a transparent and reliable process for fair and sustainable results. In this way, mutual trust and cooperation can be developed between the sub-project stakeholders and Elazığ Municipality through corrective actions. The main components of a successful grievance mechanism include the principles of anonymity, confidentiality and transparency.

Elazığ Municipality website includes a communication page, which is the mechanism where grievances/requests regarding Elazığ Municipality activities are submitted and the resolution process is followed (See Figure 6). In addition, many sections of the homepage of Elazığ Municipality website include information about social media accounts and telephone numbers (such as the Alo 153 line) to which grievances can be submitted.

- Elazığ Municipality's Website:
- Elazığ Municipality's E-mail address: elazig@elazig.bel.tr
- Elazığ Municipality's Call Centre: 153
- Elazığ Municipality's Phone number: +90 424 248 47 01
- Elazığ Municipality's Address for Official Letter/Petition: Cumhuriyet Mah. Malatya Street No: 34 Elazığ



**Figure 6. Elazığ Municipality Website**

Grievances, requests, suggestions and opinions of the people affected by the subproject will be recorded through the GM Liaison Person (GMCP) to be appointed by Elazığ Municipality. All grievances will be reviewed to categorize them according to whether they are genuine or not and whether they are related to the subproject activities. A grievance will be investigated whether it is genuine or not, or whether it is related to sub-project activities or not, and if it is not deemed appropriate for investigation, an explanation will be provided to the complainant as to why the grievance cannot be pursued. Grievances received will be evaluated within Elazığ Municipality and forwarded to the relevant units. Eligible grievances will be responded to according to the social and environmental requirements of the subprojects identified in the ESMP and SEP.

All grievances received through direct phone calls, e-mails, face-to-face meetings/communications and the Website are recorded and after the recording process, will contact the complainant to explain the sub-project response process and the resolution of the grievance within ten (10) business days. The proposed solutions are communicated to the

complainant with a second notification. If the proposed solution is accepted by the complainant, Elazığ Municipality will handle the grievance within 15 business days and take corrective measures to resolve the grievance. A notification is required to be sent to the complainant by Grievance Mechanism Contact Person (GMCP) within two (2) business days of the receipt of the grievance, indicating that the grievance has been received and evaluated.

Complaints from contractors and subcontractors will be forwarded to GMCP and will be entered into the Complaints Database by GMCP using complaint registration forms. Complaints will be recorded in the GM system through Consultation Forms (see Annex-D). Once the complaint has been resolved and the outcome communicated to the complainant, the designated GMCP will obtain the necessary signatures and close the complaint by completing the Complaint Closure Form (See Annex-B).

### **Management of Sexual Exploitation and Abuse/Sexual Harassment issues:**

Since there are special procedures/principles for handling sensitive content grievances (i.e. sexual exploitation and abuse/sexual harassment and gender-based violence in the workplace or potential child abuse in Sub-Project areas), these grievances will be handled centrally at ILBANK, not at Elazığ Municipality's or Contractor level.

ILBANK's GM procedure has been prepared in accordance with WB ESF/ESS10 and it also complies with the World Bank's environmental and social standards. In case a sensitive complaint is received by the Contractor or Elazığ Municipality, they will be responsible for conveying the issue directly to the ILBANK GM focal point. However, Contractor and Elazığ Municipality should still be trained and informed about the principles applicable to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and Gender Based Violence (GBV) cases<sup>4</sup>.

Elazığ Municipality official who will manage the Grievance Mechanism will be knowledgeable about the guidelines prepared by the World Bank to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in negative reactions from the community. It is highly important that the victims raising grievances involving these issues can do so anonymously. In addition, the authorities handling the grievances should address such issues within confidentiality and with an unbiased approach and to ensure this, such grievances should be handled through a separate procedure

All stakeholders who have lodged a grievance may request that their applications be assessed in confidentiality. Elazığ Municipality will ensure that the name and contact details of the complainant are not disclosed without their consent.

### **6.3. Grievance Mechanism for Workers**

The GM for employees (applicable to both Elazığ Municipality personnel and contractor and subcontractor employees) has been established in accordance with WB ESS2. The implementation of the GM for employees will be ensured throughout the financing life cycle of the sub-project. PIU requests contractors to develop and implement a grievance mechanism for the workforce, including subcontractors, before starting work. Subcontractors will prepare Labor Management Plan that will include a detailed description of the grievance mechanism for employees.

Employees are informed about employee rights, basic occupational health and safety, the grievance mechanism and its operation at the time they start work. An up-to-date list of contact points is available in employee handbooks and/or bulletin boards. All processes related to the grievance mechanism are conveyed in a language that employees can understand. In the event of a dispute regarding employee rights, it is essential that the employee experiencing the problem and his/her manager come together informally and resolve the problem without resorting to the grievance mechanism or legal means.

When employees detect a hazard or risk for which no precautions have been taken regarding occupational health and safety, they inform the employee representative, occupational safety specialist and/or occupational physician selected by the employees about this hazard or risk. The employee representative shall forward the details of the hazard and risk to the occupational health and safety board, if any, or to the employer/employer's representative, and request an evaluation. If the problem is not resolved, all legal rights are reserved by applying to the contractor/subcontractor level SM contact persons through the grievance boxes located at the workplaces. Requests regarding employee rights and occupational health and safety are collected in complaint boxes placed in areas that employees can easily access.

The collected complaints and suggestions are carried out in accordance with the periods determined in the basic process of the grievance mechanism.

After the applications are evaluated, if there is an imminent, urgent and vital danger, a notification can be made directly to the Labor Life Communication Center, ALO 170 line or the Provincial Labor and Employment Institutions Directorates operating in the province. Upon receipt of the requests, the workflow complaint mechanism is carried out in accordance with the workflow chart.

The Elazığ Municipality/PIU Team will be ready to handle complaints regarding working conditions. The Elazığ Municipality/PIU Team will evaluate complaints and suggest solutions for direct and contracted employees using this internal GM, which all sub-project employees can easily access.

Grievance mechanism operation diagram details are given in table (See Table 7).

**Table 7. Grievance Mechanism Flow Chart**

Grievance Process	Requirement / Action
Submission of a grievance	Receiving the grievance by any communication channel explained above. (At this point, if the grievance is a sensitive grievance involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2 days after receiving of the grievance. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the project sites, the grievance will be directed by the GRM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.”)
Registration of grievance	Registering/recording through making an entry in the sample grievance register table. All the grievances will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met.
Forwarding of grievance	The grievance is forwarded to relevant persons (site manager on construction sites and experts of the PIU) responsible for handling the grievance in not later than three working days upon receiving the grievance (except for any emergent grievance, which would be handled as appropriate).
Evaluation of a grievance	Evaluating the grievances within 10 working days and determining whether the grievance meets the admissibility criteria. If the grievance is not valid, providing relevant explanation to the complainant.
Response for a grievance	<p>If the grievance is valid, identifying and taking corrective measures for resolving the grievance in not later than 15 working days upon receiving.</p> <p>All comments and grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.</p> <p>At this point, it should be noted that the action taken and the result of this anonymously recorded grievance should be shared on the Elazığ Municipality website, so that anonymous complainants is informed about their grievance and the results.</p>
Recording the result of a grievance	Recording the result of the grievance in register table.
Right to Appeal	<p>If the grievance cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follow:</p> <ul style="list-style-type: none"> <li>• Civil Courts of First Instance</li> <li>• Administrative Courts</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts, and</li> <li>• Ombudsman</li> </ul> <p>(<a href="https://ebasvuru.ombudsman.gov.tr/">https://ebasvuru.ombudsman.gov.tr/</a>)</p>

## **ILBANK Grievance Mechanism**

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. The GM Procedures for ILBANK GM is available on its official webpage.

Below is the list of communication channels for ILBANK GM:

- ILBANK Website: <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- ILBANK Phone number: +90 312 508 7979
- ILBANK E-mail: [bilgiuidb@ilbank.gov.tr](mailto:bilgiuidb@ilbank.gov.tr) and [etikuidb@ilbank.gov.tr](mailto:etikuidb@ilbank.gov.tr)
- ILBANK Address for Petition Service (ILBANK International Relations Department, Grievance Mechanism Team - Emniyet Mahallesi Hipodrom Caddesi 9/21 Yenimahalle/Ankara)

## **7. MONITORING AND REPORTING**

### **7.1. Summary of how SEP implementation will be monitored and reported**

It is the responsibility of Elazığ Municipality to ensure that the SEP is fully integrated and implemented in all sub-project activities. All stakeholders will be consulted and will be able to use the GM throughout the sub-project lifecycle. On the other hand, the SEP will form part of all tender documents related to the physical works within the scope of the sub-project.

As part of the World Bank ESF requirements, the draft ESMP and draft SEP will be made public when approved for public disclosure and approved by İLBANK, and the disclosure will be the responsibility of the sub-project Implementers and the consultant firm Elazığ Municipality. Ensure that the SEP is published in hard copy and on the website. Similarly, several copies of all prepared environmental and social documents will be available locally in Elazığ Municipality, where affected groups such as the Mukhtar offices operating in the Central District of Elazığ Province and local NGOs can easily access.

The SEP is a dynamic document and will be reviewed, updated and approved by İLBANK when necessary (e.g. changes in the design of sub-project components according to Environmental and Social Monitoring Reports, stakeholders' requests/grievances regarding the sub-project. Implementation of the SEP throughout the implementation of the sub-project, elimination of non-conformities, etc.). Elazığ Municipality will be responsible for making a statement through communication channels for each updated version of the SEP.




**Table 8. Reporting Process Requirements and Distribution of Roles**

Responsible Party	Roles & Responsibility
PIU	<p>PIU will submit monthly reports to the ILBANK through the Grievance Record Table (Annex-A) containing up-to-date information on the following issues related to the GM, and the ILBANK will submit quarterly reports to the World Bank:</p> <ul style="list-style-type: none"> <li>• Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.),</li> <li>• Numerical data on the number of requests (applications, suggestions, complaints, demands, positive feedback) received and the number of complaints resolved,</li> <li>• Qualitative data on the types of requests and responses, issues presented and unresolved complaints, Level of satisfaction by action taken (response),</li> <li>• Any corrective action taken.</li> </ul>
Supervision Consultant	<p>Supervision Consultant will additionally submit the Grievance Record Table and Monthly Reports containing up-to-date information on the following subjects to Elazığ Municipality and PIU:</p> <ul style="list-style-type: none"> <li>• Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.),</li> <li>• Numerical data on the number of requests (applications, suggestions, complaints, demands, positive feedback) received and the number of complaints resolved,</li> <li>• Qualitative data on the types of requests and responses, issues presented and unresolved complaints, Level of satisfaction by action taken (response),</li> <li>• Any corrective action taken.</li> </ul>
Contractor	<p>The contractor/subcontractor shall submit to the Elazığ Municipality a Grievance Record Table and monthly reports as an annex to the consultant firm, containing up-to-date information on:</p> <ul style="list-style-type: none"> <li>• Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.),</li> <li>• Numerical data on the number of requests (applications, suggestions, complaints, demands, positive feedback) received and the number of complaints resolved,</li> <li>• Qualitative data on the types of requests and responses, issues presented and unresolved complaints, Level of satisfaction by action taken (response),</li> <li>• Any corrective action taken.</li> </ul>

# ANNEXES


## Annex-A

### Sample Grievance Submission Form

	<b>ELAZIG MUNICIPALITY</b>	
	<b>SOLAR POWER PLANT PROJECT</b>	
<b>GRIEVANCE FORM</b>		
Person Filling Out the Form:		Date and time:
Inteviev Agenda:		Reference No: Elazığ Municipality-Project Code-0001-2..
<b>1. INFORMATION ABOUT THE COMPLAINANT</b>		
Name surname: <i>If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met.</i>		<b>How received the Grievance:</b>
TC Identification number:		Telephone / Toll Free Line <input type="checkbox"/>
Telephone:		Face to Face Meeting <input type="checkbox"/>
Address:		Website / Email <input type="checkbox"/>
Email:		Other (Explain) <input type="checkbox"/>
<b>Stakeholder Type</b>		
Public <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterpris <input type="checkbox"/> Trade Associatio <input type="checkbox"/> NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industrial Assosiaction <input type="checkbox"/>	Labor Union <input type="checkbox"/> Media <input type="checkbox"/> University <input type="checkbox"/>
<b>2. DETAILED INFORMATION ABOUT THE GRIEVANCE</b>		
Description of the grievance:		
Solution method requested by the complainant		
<b>Registrant Name Surname/Signature</b>		<b>Complainant Name Surname/Signature</b>

## Annex-B

### Sample Grievance Closure Form

	<b>ELAZIG MUNICIPALITY</b>	
	<b>SOLAR POWER PLANT PROJECT</b>	
<b>GRIEVANCE CLOSURE FORM</b>		
Reference form:		
<b>1. DETERMINATION OF CORRECTIVE ACTION</b>		
1		
2		<input type="checkbox"/>
3		<input type="checkbox"/>
4		<input type="checkbox"/>
5		<input type="checkbox"/>
<b>2. CLOSE OUT THE GRIEVANCE</b>		
<i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i>		
<b>Name Surname / Signature of the Person Closing the Complaint/Date</b>	<b>Name Surname / Signature of Complainant/Date</b>	


Annex-C

Grievance Database Form

	Complaint Register Number		How Complaint is Received (Grievance Form, Community Meeting, Telephone)		Level of Grievance (Municipality/Utility Level, Regional ILBANK Office, ILBANK HQ Level)		Date of Complaint Received		Location of Complaint Received		Name of Person Receiving Grievance		Land Parcel # (If complaint is related to land)	Complainant Information						Sub-Project Component Related to Complaint		Grievance Category (expropriation/land acquisition related, environmental issues, damages to structures etc.)		Complaint Summary		Grievance Status (open, closed or pending)	Action Taken					Supporting Documents for Grievance Closeout (bank receipt for compensation, grievance closure protocol)
													Name/Surname	ID Number	Telephone/ e-mail	Village-District	Gender										Responsible Person/Department	Action Planned	Due Date of the Addressing the Grievance	Date of Action Taken		


## Annex-D

### Sample Consultation Form (For Stakeholder Participation Meeting(s))

	<b>ELAZIG MUNICIPALITY</b>	
	<b>SOLAR POWER PLANT PROJECT</b>	
<b>CONSULTATION FORM</b>		
Person Filling Out the Form:		Date timeand place:
Meeting Agenda:		Interview Registration Number: Elazığ Municipality/Project Code-0001-2..
<b>1. INTERVIEW INFORMATION</b>		
Interviewed Institution:		Form of Communication
Name and Surname of the Interviewee:		Telephone / Toll Free Line <input type="checkbox"/>
Telephone:		Face to Face Meeting <input type="checkbox"/>
Address:		Website / Email <input type="checkbox"/>
Email:		Other (Explain) <input type="checkbox"/>
<b>Stakeholder Type</b>		
State agency <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterpris <input type="checkbox"/> Job Room <input type="checkbox"/> NGO <input type="checkbox"/>
Interest Groups <input type="checkbox"/>	Industrial Unions <input type="checkbox"/>	Labor Union <input type="checkbox"/> Media <input type="checkbox"/> University <input type="checkbox"/>
<b>2. INTERVIEW DETAILS</b> (List of Invitees and actual participants, Summary of presentations made by whom, minutes of meeting will be annexes of this form.)		
Questions about the project:		
Concerns/feedback regarding the project:		
Responses to the views expressed above:		

## Annex-E

### Sample Key Informant Interview Form (For Single Stakeholder Interviews)

 <b>ELAZIĞ BELEDİYESİ</b>	<b>ELAZIG MUNICIPALITY SOLAR POWER PLANT PROJECT</b>	
<b>KEY INFORMANT INTERVIEW FORM</b>		
Person Filling Out the Form:	Date timeand place:	
Meeting Agenda:	Interview Registration Number: Elazığ Municipality/Project Code-0001-2..	
<b>1. INTERVIEW INFORMATION</b>		
Interviewed Institution:	Form of Communication	
Name and Surname of the Interviewee:	Telephone / Toll Free Line <input type="checkbox"/>	
Telephone:	Face to Face Meeting <input type="checkbox"/>	
Address:	Website / Email <input type="checkbox"/>	
Email:	Other (Explain) <input type="checkbox"/>	
<b>Stakeholder Type</b>		
State agency <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterpris <input type="checkbox"/>
Job Room <input type="checkbox"/>	NGO <input type="checkbox"/>	
Interest Groups <input type="checkbox"/>	Industrial Unions <input type="checkbox"/>	Labor Union <input type="checkbox"/>
Media <input type="checkbox"/>	University <input type="checkbox"/>	
<b>2. INTERVIEW DETAILS</b> (List of Invitees and actual participants, Summary of presentations made by whom, minutes of meeting will be annexes of this form.)		
Questions about the project:		
Concerns/feedback regarding the project:		
Responses to the views expressed above:		

## Annex-F

### Images of consultation meetings

#### Consultation with Şahinkaya Neighborhood Mukhtar



#### Elazığ Forestry Regional Directorate Forest Engineer



Şahinkaya Neighborhood People





