

Republic of Türkiye

Ministry of Environment, Urbanization and Climate Change

TÜRKİYE EARTHQUAKE RECOVERY & RECONSTRUCTION PROJECT (TERREP) (P180849)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

DRAFT

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ABBREVIATIONS AND ACRONYMS

CIMER	The Communication Center of the Presidency
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GDCA	Directorate General of Construction Affairs
GM	Grievance Mechanism
GRS	Grievance Redress Service
GT	Government of Türkiye
LMP	Labor Management Procedures
MoAF	Ministry of Agriculture and Forestry
MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
МоН	Ministry of Health
Mol	Ministry of Interior
МоТ	Ministry of Trade
ΜοΤΙ	Ministry of Transport and Infrastructure
MoYS	Ministry of Youth and Sports
РАР	Project-Affected People
PDoEUCC	Provincial Directorate of Environment, Urbanization and Climate Change
PIU	Project Implementation Unit
РОМ	Project Operational Manual
RF	Resettlement Framework
RP	Resettlement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
TERRP	Türkiye Earthquake Recovery and Reconstruction Project
WB	World Bank

EXECUTIVE SUMMARY

Two earthquakes with a magnitude of 7.8 Mw (± 0.1) and 7.5 Mw occurred on February 6, 2023, nine hours apart, with epicenters in the Pazarcık and Ekinözü districts of Kahramanmaraş, respectively. As a result of the earthquakes, at least 50 thousand 399 people died in Türkiye, and at least 8 thousand 476 people in Syria according to official figures, and more than 122 thousand people were injured in total. More than 24,000 aftershocks of up to 6.7 Mw occurred after the earthquakes. The provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, Şanlıurfa and Elazığ were affected by the earthquakes. Türkiye Earthquake Recovery and Reconstruction Project (TERREP) is an emergency project funded by the World Bank and implemented by the Ministry of Environment, Urbanization and Climate Change MoEUCC in cooperation with the Disaster and Emergency Management Presidency (AFAD). The main objective of the project is the in-situ reconstruction of collapsed or severely damaged village houses in rural areas. The project aims to reconstruct approximately 1500 village houses. Right owners will choose from building types designed by the rural area.

This document has been prepared to describe the ways of communication with stakeholders who will be directly or indirectly affected by the Project within the scope of the TERRE Project. The stakeholder engagement plan is a map that will enable stakeholders to participate in the project and communicate their views, requests, and complaints to the Project Implementation Unit. The SEP outlines the general principles and collaborative strategy (i) to identify stakeholders for all components of the Project, (ii) to identify appropriate modes of engagement, and (iii) to prepare plans for engagement and meaningful consultation throughout the project cycle while ensuring transparency. The goal of the SEP is to improve and facilitate decision-making and create an atmosphere of understanding that actively involves project-affected people (PAPs) and other stakeholders on time and that these groups are provided sufficient opportunity to voice their opinions and concerns.

This SEP outlines the process of stakeholder identification duly considering all stakeholders relevant to the Project including its components and sub-components. The identified stakeholders include those currently associated with the Project and those who will be associated with the Project at a later stage during implementation. Stakeholders are identified and categorized under three groups: i) project-affected parties, ii) other interested parties, and iii) disadvantaged and vulnerable groups. The framework provides details of the systematic consultation with the project-affected people, women, vulnerable and poor members of the community, and other stakeholders to understand their interests and influence over the project.

1. INTRODUCTION

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process implemented within the scope of the Türkiye Earthquake Recovery & Reconstruction Project ("TERREP" or the "Project"). The SEP is prepared under the World Bank's ESS10 Stakeholder Engagement and Information Disclosure.

Two earthquakes with a magnitude of 7.8 Mw (\pm 0.1) and 7.5 Mw occurred on February 6, 2023, nine hours apart, with epicenters in the Pazarcık and Ekinözü districts of Kahramanmaraş, respectively. As a result of the earthquakes, at least 50 thousand 399 people died in Türkiye, and at least 8 thousand 476 people in Syria according to official figures, and more than 122 thousand people were injured in total. More than 24,000 aftershocks of up to 6.7 Mw occurred after the earthquakes. The provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, Şanlıurfa and Elazığ were affected by the earthquakes.

This project will provide financing to AFAD and MoEUCC for the support and improvement of emergency repairs, construction of new rural houses, and, if necessary, demolition/reconstruction of damaged infrastructure such as drinking water network, sewerage, and rural road in the provinces affected by the February 6, 2023 earthquakes. Within the scope of the project, it is aimed to finance approximately 1500 houses and infrastructure by the World Bank. The Project includes four components: Component 1 – Restoration of Municipal Infrastructure and Services; Component 2 – Restoration of Health Services; Component 3 –Emergency Housing Support and Recovery; Component 4 – Project Management, Monitoring & Evaluation. MoEUCC will be responsible for Component 3 and Component 4.3 with the AFAD.

The project will be implemented by MoEUCC through its GDCA. Within GDCA a separate department, the Internationally Funded Seismic Retrofitting Department has been established in 2022 to work as the dedicated Project Implementation Unit (PIU) to manage the ongoing Seismic Resilience and Energy Efficiency in Public Buildings of Türkiye (SREEPB), which consists of Project implementation and TA activities related to the public building sector. This department is responsible for the day-to-day management of the SREEPB Project under terms of reference and with adequate staffing, and with qualifications and functions acceptably to the Bank. The department/PIU currently includes about 15 technical staff and 5 individual consultants hired to support in the areas of procurement, financial management, engineers (electrical, mechanical, civil), environmental and social issues, and communication. A new team will be established under this existing PIU to administer all aspects of the proposed Project.

Accordingly, while undertaking works and activities to meet the objectives, GDCA will also aim to ensure the continued involvement and participation of their stakeholders throughout the project life.

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of the project's environmental and social risks. Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays. In addition, the framework assists in managing stakeholder expectations which will have a bearing throughout the lifespan of the project.

The objectives of the SEP are the identification of the project stakeholders at different stages of development and the establishment of their rules for the management of the exchange of information between the Project Implementation Unit (PIU) and the stakeholders in line with the national regulation and the World Bank (WB) Requirements. The purpose of the SEP is to present how the GDCA/PIU plans to communicate with stakeholders who may be affected by or will be interested in the TERRE Project throughout the project life cycle. It also describes a grievance mechanism, which is a process that

stakeholders may use to raise any concerns about the Project providing their opinions that may influence the Project implementation and its results.

The Stakeholder Engagement Plan is a living document, so it will be reviewed and updated periodically and in line with new activities, changes in the Project, and newly identified stakeholders. The up-to-date version of this SEP will be disclosed before starting the project activities.

2. PROJECT DESCRIPTION

a. PROJECT OBJECTIVE

Project Development Objective is to emergency housing support and recovery in the provinces affected by the February 6, 2023 earthquakes. In the provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, Şanlıurfa, a total of 143,261 rural houses will be reconstructed with their infrastructure if needed. In the scope of the Project,

- Resilient reconstruction of collapsed/heavily damaged rural houses and barns in-situ, including assessment studies, design/supervision consultancy, and works.
- Repair/strengthening and reconstruction of damaged infrastructure (including water, sanitation, roads) and social facilities in villages where housing is being improved or construction of such infrastructure/facilities in new houses,
- Technical assistance to strengthen aspects of the existing rural housing program in a post-disaster context,
- Technical assistance and advisory services to support key strategic approaches and planning for medium/long-term resilient recovery, including multi-hazard risk assessments and mitigation plans, integrated housing and infrastructure planning, urban/land use plans, etc., and urban area restructuring will also be addressed under the Project.

The components and sub-components of the Projects are given in the next section by detailed.

b. PROJECT COMPONENTS

The Project includes four components: Component 1. Restoration of Municipal Infrastructure and Services; Component 2. Restoration of Health Services; Component 3. Emergency Housing Support and Recovery; Component 4. Project Management, Monitoring & Evaluation.

Component 1. Restoration of Municipal Infrastructure and Services

Subcomponent 1.1. Resilient rehabilitation and reconstruction of municipal infrastructure:

This subcomponent will finance the rehabilitation and reconstruction of existing municipal water, sanitation, wastewater, and drainage services damaged by the earthquakes. Eligible activities will include the repair and reconstruction of damaged water and sewage networks, water treatment plants, wastewater treatment plants, stormwater drainage, etc. to be more disaster and climate resilient and, as such, be better adapted for climate change and/or would consider the introduction of climate-smart/nature-based technologies and solutions contributing to climate change mitigation. The subcomponent may also support the installation of temporary water and sanitation facilities for container cities, such as package wastewater treatment plants, solar thermal hot water collectors, portable rainwater storages, etc., as needed. This subcomponent will also finance rehabilitation and resilient reconstruction of municipal roads, bridges, underpasses, and allied infrastructure that have been damaged by the earthquakes.

Subcomponent 1.2: Resilient Recovery of critical municipal service facilities. This subcomponent will finance the rehabilitation and reconstruction of municipal fire station buildings and the purchase of equipment required to restore the provision of firefighting, emergency response, and other critical municipal services. Eligible activities will include inter alia: (a) installation of prefabricated facilities to provide critical municipal fire and emergency services during transition periods and ensure continuity of services, as needed; (b) repair and strengthening of lightly damaged municipal fire stations; (c) in-situ resilient reconstruction of destroyed, heavily and moderately damaged municipal fire stations or reconstruction of such facilities in new locations as deemed acceptable according to the World Bank's ESF; and (d) the acquisition of emergency response and municipal services equipment and vehicles (e.g. firefighting and rescue vehicles and equipment, solid waste collection vehicles, buses, street sweeping vehicles, etc.) to restore the municipal capacity for essential service

provision. These activities will also contribute to strengthening the capacity and preparedness of the affected municipalities to respond to future disasters, including climate change-imposed challenges and the expected growing impact of extreme weather and natural hazards.

Component 2. Restoration of Health Services. The responsibility for overall management and implementation of Component lies with the MoH through the existing Project Management Support Unit (PMSU). This component will support activities to ensure continuity of access to health services for the affected population in the immediate and short-term. This will include establishing and ensuring the operation of prefabricated primary health care (PHC) facilities and equipping field emergency hospitals, establishing a network of field and mobile PHC and diagnostic services, restoring depleted medical supplies, improving access to vaccination, supporting access to disability support, and supporting sanitation measures to ensure clean water and prevent infectious diseases.

1. Subcomponent 2.1. Ensuring continuity of primary-level and hospital-level health services: This subcomponent will support the establishment of a network of fixed prefabricated family health centers supported by mobile PHC units. The prefabricated facilities are needed to replace the collapsed, heavily, and moderately damaged primary health care buildings (Family Medicine Centers) in the earthquake region until permanent PHC facilities can be reconstructed. The mobile units will also allow healthcare providers to provide services to displaced populations in tent camps, container cities, refugee shelters, and scattered villages in rural areas. In line with MoH's interim strategy to restore PHC services, the subcomponent will finance (i) the installation of 350 prefabricated, fully equipped family health centers with an average of 3-4 family medicine units in each, for primary health care service delivery in the region; and (ii) procurement of 250 mobile health clinics to reach out to the different temporary settlements with large, displaced population and rural regions. This subcomponent will also support the operation of eleven prefabricated emergency hospitals through the procurement of furnishings and medical equipment.

Subcomponent 2.2: Providing mobile pharmaceutical and diagnostic services. This subcomponent will establish a network of mobile diagnostic services to support the field emergency hospitals and prefabricated PHC facilities. Activities will include the purchase of (i) vehicles equipped with mobile imaging equipment, (ii) mobile public health laboratories for microbiology and water analysis, (iii) mobile computerized tomography devices, (iv) mobile digital X-ray and ultrasound devices, (v) home health care services vehicles and related kits, (vi) ambulances and fully equipped medical all-terrain vehicles, and (vii) mobile command control vehicles.

Subcomponent 2.3: Supporting access to vaccination, disability services, and medical equipment: This subcomponent will finance activities to restore MoH's capacity in vaccination, address the needs of people disabled due to earthquakes, and curb the spread of infectious diseases. Activities will include: (i) the replacement of damaged provincial and district vaccine warehouses with prefabricated and light steel construction vaccine storage containers to be located in the major cities of Hatay, Malatya, Kahramanmaras, Adıyaman and Adana that will service as regional vaccine warehouses for the earthquake region; (ii) provision of vaccine transport vehicles to ensure timely distribution of vaccines from the regional warehouses to settlements across the earthquake region, including container cities, dispersed villages in rural areas, and refugee shelter camps; (iii) provision of equipment for disability services, including inter alia, microprocessor prosthesis, orthotics and prosthesis, and battery-powered wheelchairs; (iv) provision of equipment and capacity building for physical therapy and rehabilitation centers in earthquake-affected provinces; and (v) provision of essential medical supplies such as biocidal products and rapid test kits.

Component 3. Emergency Housing Support and Recovery. The responsibility for overall management and implementation of Component 3 will lie with MoEUCC's General Directorate for Construction Affairs (GDCA), in close coordination with AFAD, the Strategy and Budget Presidency (SBP), the MoTF, and other relevant directorates of MoEUCC.

Subcomponent 3.1: Rural housing reconstruction: This subcomponent will finance civil works, consultancy, and non-consulting services to support the recovery of the earthquakes-affected rural villages under the government's existing post-disaster housing reconstruction program. For resilient reconstruction of rural houses assessed as collapsed, severely or moderately damaged, preference will be given for in-situ reconstruction to the extent possible under the Project. Civil infrastructure works

will support the repair or reconstruction of damaged municipal infrastructure/engineering networks where housing is reconstructed in situ. The subcomponent will also provide technical assistance to strengthen the current post-disaster rural housing program.

Subcomponent 3.2: Resilient recovery foundations for cities and inclusive post-disaster housing support: This subcomponent will finance technical assistance and advisory services to AFAD's General Directorate of Housing and Construction Works, and MoEUCC's General Directorate of Construction Affairs to support planning for medium/longer term resilient reconstruction and improve post-disaster housing programs for future disasters.

Component 4. Project Management, Monitoring & Evaluation

This component will finance consultant and non-consulting services, goods, training, and operating costs for supporting the Implementing Agencies in project management and implementation activities under the Project, including, but not limited to, monitoring and evaluation, reporting, procurement, financial management, environmental and social management, grievance redress mechanism, and project communication and outreach.

MoEUCC will be responsible for Component 3 and Component 4 in close coordination with AFAD. MoEUCC will be responsible to carry out the building assessments in compliance with the "Presidential Decree No:1-Regulating the duties and responsibilities of MoEUCC". Considering the urgency of the work, the MoEUCC was granted special powers with the "Law on Acceptance of the Presidential Decree Regarding Settlement and Construction Under the Event of Emergency" published in the Official Gazette dated April 10, 2023, No: 32159. For instance; without waiting for the special zoning plans, the MoEUCC has the authority to make the application with the layout plan and building permit in line with the geological survey and ground survey report. MoEUCC is authorized to make all kinds of constructions including infrastructure and superstructure and to determine the land shares. AFAD will be responsible for (with MoEUCC's technical input) identifying the resettlement areas and confirming the areas suitable for in-situ reconstruction to MoEUCC. AFAD will undertake and finalize the identification of rights holders.

MoEUCC and AFAD will work in close coordination and collaboration through a protocol to be signed.

The Project will carry out meaningful consultations with the rights holders' on; i) designs, ii) scope of agreements and financial obligations, ii) to identify other needs of the stakeholders that can be considered/supported and matches these with existing support already provided by the government.

MoEUCC currently has five (5) typical types of house designs for rural housing which have been already implemented in different provinces due to different disasters experienced in Türkiye. During the implementation, of these five existing typical housing designs, the right owners will be asked for their preference. In addition to these above-mentioned five typical housing types, the MoEUCC also has a pool of typical house designswhich can be utilized for this Project to be able to meet smaller housing needs and more economical preferences of the right owners.

c. PROJECT LOCATION

The two earthquakes with a magnitude of 7.8 Mw (\pm 0.1) and 7.5 Mw occurred on February 6, 2023, nine hours apart, with epicenters in Pazarcık and Ekinözü districts of Kahramanmaraş, respectively. As a result of the earthquakes, at least 50 thousand 399 people died in Türkiye, and at least 8 thousand 476 people in Syria according to official figures, and more than 122 thousand people were injured in total. More than 24,000 aftershocks of up to 6.7 Mw occurred after the earthquakes. The Project will be carried out in the provinces of Adana, Adıyaman, Diyarbakır, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye, Şanlıurfa and Elazığ shown in the map provided in Figure 3 given below.

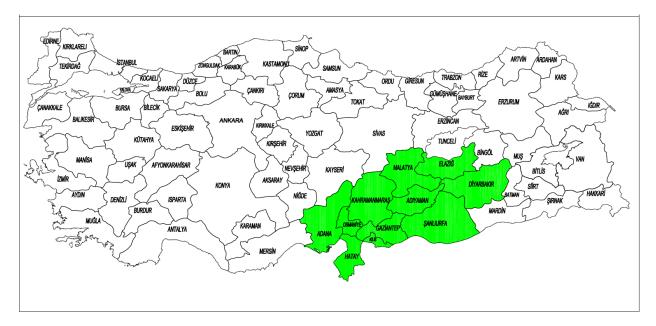


Figure 1 .: Project Provinces

In addition to the destruction in the cities, the earthquakes damaged 143,261 rural houses (see Figure 2) and all of them have to be rebuilt. However, approximately 1500 houses and their infrastructures will be supported and financed in this Project.

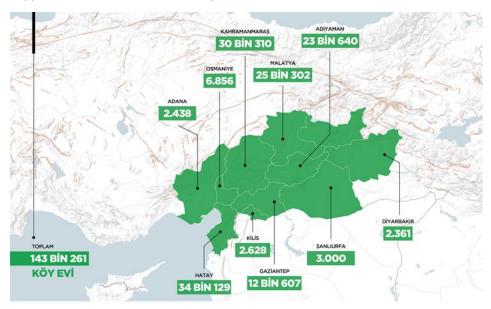


Figure 2. : The breakdown of houses to be reconstructed by the city in the earthquake region

The identification process of the exact locations of the houses to be built within the scope of the project is still under discussion and once the list of provinces and villages is finalized, this SEP will be updated accordingly.

3. REGULATORY CONTEXT

a. NATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT

The right to information is the right of individuals to access the information included in the records of public institutions and agencies. National legislation on the right to information is:

- Constitution of the Republic of Türkiye
- Law on the Right to Information
- The Law on Use of the Right to Petition
- Regulation on Environmental Impact Assessment

Constitution of the Republic of Türkiye

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

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

- Online application through the website; <u>https://www.cimer.gov.tr/</u> and in E-Government website; <u>https://giris.turkiye.gov.tr/</u>
- Hotline: 150
- Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe Ankara
- Phone: +90 312 590 2000
- Fax: +90 312 473 6494

Public institutions and agencies shall provide the requested information within 15 working days. If 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 content of the application pertains to 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 (Article 11).

Law on the Right to Information (No. 4982)

The purpose of this law is to regulate the procedure and basis of the right to information following the principles of equality, impartiality and openness, which are the requirements of a democratic and transparent government. According to the obligation to provide information (Article5), institutions and organizations are required to take necessary administrative and technical measures for all kinds of information and documents, considering the exceptions set out in this law, to provide information to

applicants; and to evaluate and decide on applications promptly, effectively and correctly. The Law on Use of the Right to Petition

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

Regulation on Environmental Impact Assessment

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

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

b) INTERNATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT

UN Universal Declaration of Human Rights

The Universal Declaration of Human Rights (UDHR) is a milestone document in the history of human rights. Drafted by representatives with different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 (General Assembly resolution 217 A) as a common standard of achievements for all peoples and all nations.

It is defined that stakeholder engagement in the context of respect for human rights is "an ongoing process of interaction and dialogue between a company and its potentially affected stakeholders that enables the company to hear, understand and respond to their interests and concerns, including through collaborative approaches.

World Bank Requirements

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

- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts"
- 2. "Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation."

- 3. "The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders."
- 4. "The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98)".

Within the framework of these principles, Stakeholder Engagement Plans are to be prepared in line with the principles and process defined in the SEP taking into account the features of the sub-projects/activities at the implementation stage. A Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts need to be developed by the Client. It has to be disclosed as early as possible, and before project appraisal and the Client needs to seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. If significant changes are made to the SEP, the Client has to disclose the updated SEP.

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

4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

After the February 6, 2023 earthquake, all units of the Ministry of Environment, Urbanization, and Climate Change carried out visits to the disaster area and following the completion of damage assessment studies, informative meetings with the participation of the local people, muhtars, NGOs, district governors, have been organized and carried out. Details of these informative meetings are provided in Table 6 given below.

Stakeholder Meetings			
Meeting Chaired by	Location	Date	
General Director of Construction Affairs	Gaziantep	27.02.2023	
Minister of Environment, Urbanization and Climate Change	Kırıkhan, Antakya, İskenderun Districs (Hatay)	28.02.2023	
General Director of Construction Affairs	Hatay Center	02.03.2023	
General Director of Construction Affairs	Defne District (Hatay)	02.03.2023	
Minister of Environment, Urbanization and Climate Change	Adıyaman	02.03.2023	
Minister of Environment, Urbanization and Climate Change	Kahramanmaraş	05.03.2023	
Minister of Environment, Urbanization and Climate Change	Malatya	07.03.2023	
Minister of Environment, Urbanization and Climate Change	Akçadağ District (Malatya)	17.03.2023	

Table 1. Stakeholder Meetings

During the meetings, the strategy of the government for the recovery period has been introduced, concerns and suggestions of residents have been received and responded and the housing designs have been introduced,

Considering the urgency of the situation, most of the Ministry's personnel were involved in damage assessment activities in the earthquake zone. Therefore, at the time of the meetings, there was no staff taking notes of the questions and answers. For this reason, the question-and-answer section cannot be presented. However, the photographs of the meetings are included in Annex 5.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS (MAPPING)

The identification and analysis should be carried out as early as possible in the project cycle by considering dynamics among the stakeholders, risks and opportunities of their inclusion in the Project and should,

- categorize stakeholders (individuals, NGOs, government institutions, etc.),
- indicate how each stakeholder group will be impacted (directly/indirectly), and
- assess their level of interest and potential influence on the project.

To meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach**: public consultations for the project(s) will be arranged during the whole life-cycle, carried out openly, free of external manipulation, interference, coercion or intimidation;
- **Informed participation and feedback**: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- Inclusiveness and sensitivity: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders are encouraged to be involved in the consultation process, to the extent the current circumstances permit. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, and elderly and the cultural sensitivities of diverse ethnic groups.

Stakeholder identification is a key step in managing the overall stakeholder engagement process. It reduces the risk that a narrow stakeholder group can dominate the consultation process. The basis of stakeholder identification is their level of interest and interaction with the project. Accordingly, project stakeholders are categorized under the following groups:

- **Direct Stakeholders** refer to persons/groups/entities within the Project Area of Influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Indirect Stakeholders** refer to other individuals/groups/entities that may be positively or negatively affected by the scope of the project due to the project locations.
- Other Interested Parties refers to individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way
- **Disadvantaged/Vulnerable Individuals or Groups** refers to persons who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project

The frequency and the appropriate engagement method(s)/tool(s) for different stakeholder groups are identified by considering the following three criteria;

- the extent of the impact of the project on the stakeholder group,
- the extent of influence of the stakeholder group on the project, and
- the culturally acceptable engagement and information dissemination methods.

In general, engagement is directly proportional to the level of interest and influence, and as the extent of the impact of a project on a stakeholder group increases, or the extent of influence of a particular stakeholder on a project increases, engagement with that particular stakeholder group should intensify and deepen in terms of the frequency and the intensity of the engagement method used.

Table 2 summarizes the potential interests and influence of each of the above-mentioned affected parties.

Stakeholder Gro	pup	Level of Interest	Level of Influence
Direct Stakeholders	 Right Owners whose damaged houses Directly involved public administrations at the National, Provincial and District Levels (MoEUCC, MoCT, MoH, MoTI, MoENR, MoAF, MoT, Presidency of Religious Affairs) 	 Directly involved public administrations at the National, Provincial and District Levels (MoEUCC, MoCT, MoH, MoTI, MoENR, MoAF, MoT, Presidency of Religious 	
Indirect Stakeholders	 Landowners and land users adjacent to the buildings Residents of municipalities, neighborhoods 	Medium	High
	Local governors and municipalities	High	High
Other Interested	 Construction companies and their employees Consultants, supervisors 	High	Medium
Parties	 NGOs – Associations at the local and national level Media General public 	Low	Medium
Disadvantaged / Vulnerable individuals or groups	 Disabled individuals Elderly individuals Pregnant women and/or women with young kids Female-headed households Immigrants, refugees, and non-native Turkish speakers Children, including those that become orphaned following the disasters. People suffering from Post-traumatic Stress-Disorder (PTSD) and/or mental health issues as a result of the disaster impacts. 	High	Medium

Table 2. Identified Stakeholder Groups for the TERRE Project

6. STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. When properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for the successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process, and forms an integral part of early project decisions and the assessment, management, and monitoring of the project's environmental and social risks and impacts.

The TERREP recognizes the rights of the local communities as key stakeholders in the project. Stakeholder engagement will be free of manipulation, interference, and intimidation, and conducted based on timely, relevant, understandable, and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions and ensure that this information is taken into consideration when making project decisions.

Stakeholder engagement activities will be ongoing through the whole life cycle of the Project, (Project's preparation, construction, and operation).

For the TERREP stakeholders will be engaged as early as possible and will continue the engagement throughout the planning, and implementation until the project is finished.

The nature and frequency of follow-up consultations will be different depending on the sub-projects to be developed.

Before starting the TERRE Project, all affected parties will be informed about the Project's scope, contact information (GM), and availability of the publicly available information on the GDCA website via consultation meetings, information boards, brochures, and flyers, printed newspaper, websites or social media. Key communication principles are to:

- Keep the community and key stakeholders informed in advance of project progress.
- Encourage community participation.
- Listen to feedback, investigate suggestions, and adopt them where possible.
- Ensure transparency.
- Adapt appropriate communication including gender-sensitive and non-discriminatory language
- Apply user-friendly engagement tools.
- Use multiple channels for communication.
- Ensure safe space, and appropriateness of how communication and engagements are handled, especially when working with vulnerable groups and people who are still recovering from post-disaster trauma.

The earthquake on February 6, 2023, caused devastation in 11 provinces of Türkiye. In addition to the city centers, serious destruction has occurred in the rural villages of these provinces. The people living in rural areas have serious problems in terms of housing. Local communities live in tents shared with other families. In addition, it is foreseen that insect problems will arise due to the warming weather. For these reasons, the people whose houses were destroyed due to the earthquake should be urgently relocated to new and safe housing. As a result of assessment studies, on-site reconstruction, including design/audit consultancy and works, will be carried out.

6.1. PROPOSED STRATEGY FOR INCLUDING VIEWS OF VULNERABLE GROUPS

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

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

Table 3 summarizes preliminary mapping carried out for the identification of the disadvantaged/vulnerable individuals/groups as well as the suggested stakeholder engagement methods for each disadvantaged/vulnerable individual/group. The stakeholder categories, including the disadvantaged/vulnerable individuals/groups and accordingly this SEP will be updated before the commencement of any project activity.

Project Component	Vulnerable Groups and Individuals	Features/Needs	The preferred method for information sharing and consultation	Additional Resource Support
Component 3	Disabled individuals	Funding for training to assist individuals with a lack of accessibility, information and special needs	Audio devices, accessible platforms, etc. special training needs	Special education coordinators, sign language translators/interpreters
	Elderly individuals	Lack of knowledge and inexperience about accessibility, online tools, services and communication channels	Communication methods inaccessible areas	Not necessary
	Immigrants, refugees, and non-native Turkish speakers	Those who have difficulties in communication	Translated documents, special translators, communication inaccessible areas	Translators
	Pregnant women and/or women with young kids	Accessibility, lack of information	Communication in accessible venues, methods	N/A

 Table 3. Summary of Disadvantaged/Vulnerable Individuals/Groups and Suggested Stakeholder

 Engagement Methods

Female-headed households			
Children	Safety, and appropriateness of communication and facilitation	Trained facilitators	Tailored communication media and approach
People suffering from PTSD and mental health issues	Safety, timing, and appropriateness of communication and facilitation, preferably using professionals trained to handle post- disaster traumas.	Trained facilitators, psychologists	Psychological support

To include the views of vulnerable groups:

- Engagements will be carried out with regional organizations and NGOs representing the rights of persons with disabilities;
- For specific cases, such as engagement with children affected by the disaster, as well as individuals suffering PTSD and mental health issues, trained facilitators and/or psychologists may be mobilized.
- Separate consultations will be conducted for elderly individuals and disabled individuals (or people with additional accessibility needs), immigrants, refugees and non-native Turkish speakers, and other disadvantaged/vulnerable groups who may be identified during the project;
- Information on the project will be provided face to face or by any other appropriate method specific to disadvantaged/vulnerable groups/individuals to be specified or specified (e.g. visually impaired alphabet, sign language, etc.);
- Consultations will be conducted at locations that provide access to disadvantaged/vulnerable groups/individuals; and

Any written or printed materials related to the project to be distributed at project sites should be accessible to the disadvantaged/vulnerable groups/individuals of the project; the materials will also be prepared in culturally appropriate and easy to understand (non-technical) language

6.2. METHODS FOR STAKEHOLDER ENGAGEMENT

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

The level of impact, in addition to the needs and concerns of the stakeholders, will determine the basis of the communication tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 4 below. The language of communication throughout the Project is expected to be Turkish; however, different languages will be also taken into consideration, if need be, to increase the efficiency of the engagement activities and ensure the involvement of all stakeholder groups. The engagement activities will be carried out in a culturally appropriate manner and will include the best approaches to interact with stakeholder groups that establish effective relationships for stakeholder engagement.

	Table 4. Engagement Methods to be employed under the Project						
Engagement Method	Application/Purpose of the Method	Target Stakeholder					
Correspondences (Letters, Phone, Emails)	 Information sharing (in particular technical) on project requirements and impacts Invitations to meetings and key events during project implementation Arrangements for obtaining permits, licenses, transfer, and allocation of project land Information and data requests that will be utilized for project implementation 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organizations/agencies					
One-on-one meetings	 Information collection on an individual basis allows stakeholders to voice their concerns/opinions about sensitive issues Establishing personal connections with key actors 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, organizations/agencies, contractors and consultants					
Formal meetings	 Collective information sharing on project requirements and impacts Receiving comments, feedback, views and perception of the project from a group of public institutions Establishing relations with public institutions 	Different national and local government authorities and officials, NGOs, academia, and organizations/agencies, national and local media					
Consultation meetings	 Information sharing (especially non-technical) to a large group of stakeholders, especially communities about the scope and timeline of the Project and sub-project activities. Receiving comments, feedback, views and perception of the project from a group of stakeholders Collecting grievances and concerns related to the project Establishing relations with affected communities, and groups 	Any stakeholder group identified throughout the project including the affected communities and groups, local NGOs, national and local government representatives/authorities, businesses, organizations/agencies, etc.					
Face-to-face interviews	 Collecting baseline data on an individual basis about project-affected people (PAPs) impacted by the project Understanding, monitoring and assessing the project activities' environmental and social impacts and risks on an individual basis Establishing relations on an individual basis 	PAPs, project workers (including workers to be employed for the construction activities, PIU staff, contracted workers, etc.), vulnerable/disadvantaged groups/people,					
Focus group discussions	 Information sharing on a specific topic to a certain group of people including vulnerable groups Receiving comments, feedback, views and perception of the project from a certain group Collecting grievances and concerns related to the project from a certain group Monitoring project activities' environmental and social risks and impacts on a certain group of stakeholders Establishing relations with certain groups 	Stakeholder groups relevant to the information to be shared and discussed during the meeting, vulnerable groups					
MoEUCC website	 Sharing project-relevant information and update on progress Disclosing project/subproject related documentation and communication tools: 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media,					

Table 4. Engagement Methods to be employed under the Project

Engagement Method	Application/Purpose of the Method	Target Stakeholder		
	 Environmental and Social Management Plan (ESMP), Occupational Health and Safety (OHS) Plan, Ex-Post social audit document, grievance mechanism (GM), presentations, brochures, etc. Announcements of key events (date/time, venue) 	academia, NGOs, businesses, and organizations/agencies		
Digital communication tools social media (Facebook, Twitter, Instagram accounts, WhatsApp groups), national/local television channels, radio stations, SMS, etc.	 Non-technical information sharing and progress updates Announcements of key events, dates and published documents related to the Project 	Any stakeholder group identified throughout the project including affected communities and PAPs, national and local media, academia, NGOs, businesses, and organizations/agencies		
Project information brochures/leaflets	 Sharing brief project information to provide regular updates Informing the stakeholders on certain issues such as land acquisition, land entry and exit, project implementation schedule, the scope of project activities and subprojects, etc. Disseminating site-specific project information 	Any stakeholder group identified throughout the project including affected communities and PAPs, businesses and organizations/agencies		
Online meeting (alternative tool if needed)	 Information sharing on a specific topic to a group of people including vulnerable groups Receiving comments, feedback, views, and perception regarding the project from a certain group Collecting grievances, concerns and feedback related to the project from a group Monitoring project activities' environmental and social impacts and risks on a group Establishing relations with local communities 	Any stakeholder group identified throughout the project, including project-affected people, vulnerable groups, etc.		
Grievance Mechanism (GM)	 Receiving and resolving any requests (such as suggestions, complaints, compliments, inquiries for information or whistle-blower complaints) received by all project stakeholders 	Any stakeholder group identified throughout the project		

6.3. INFORMATION DISCLOSURE

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the lifetime of the Project.

The PIU will provide all relevant and available information for the TERRP to the public through different communication channels (social media, official webpage, announcements, community representatives, local CSOs/NGOs, etc). All project-related documents, and materials will be disclosed and made available throughout the life of the project on the official webpage of the MoEUCC.

All stakeholders, including the public, will be able to use the Grievance Mechanism (GM). The goal of the GM is to strengthen accountability to and the people and to provide channels for project stakeholders to provide feedback and/or express their concerns and grievances related to project activities. Detailed information about GM is given in Section 8.

The Supervision Consultant, under the supervision of the PIU, will prepare Project communication materials such as brochures, and posters for informative purposes and these materials will be delivered to the relevant stakeholders.

The PIU will be responsible for the disclosure of environmental and social instruments (ESMP/ESIA, SEP, RP, GM procedure, etc.) before the commencement of the project so that the stakeholders will be informed about the project details and communication channels to raise their requests (suggestions, grievances, questions, etc.) regarding the Project.

The PIU will be responsible for the disclosure and consultation of all environmental and social instruments to be prepared within the scope of the Project for 14 days to ensure the dissemination of sufficient information to all stakeholders about project activities. In addition to this information, the housing types that will be offered to the preference of the right owners will also be available on the website.

Table 3. The Overview of the Stakeholder Engagement Program

Project Phase	Consultation Subject/Message to be delivered	List of information to be disclosed	Method Used	Target Stakeholder	Frequency	Responsible Party
Preparation	 Inform the stakeholders about the scope and needs of the Project. Consult the stakeholders about project design, including housing preferences, needs, Eligibility criteria, including options if not considered eligible. environmental and social risks and impacts, proposed mitigation measures, Building back better ESMF, LMPGMs 	 Project concept, E&S principles, and obligations Eligibility criteria for housing, procedures to access project benefits, including any relevant requirements. E&S documents (ESMF, RP) 	 Opening meeting Public announcements Non-technical project summaries/presentations Electronic publications Social media Press releases Consultation meetings (virtual/face-to-face) Digital communication tools Grievance Mechanism Poster, brochure, leaflet, etc. SMS Engagement with vulnerable groups will be tailored to ensure safety and their inclusion as part of the sub-project design. 	 Project Affected Parties Disadvantaged/ Vulnerable individuals or groups Other interested parties 	Before the commencement of component activities Throughout the project lifecycle	• MoEUCC PIU
Implementation & Construction	 Inform the stakeholders about the project scope and ongoing activities, including any emerging issues and/or problems E&S documents (ESMF, ESMPs, OHSP, etc.) GMs 	 ESMPs RPs GM procedure Regular updates on Project development/ implementation 	 Public announcements Non-technical project summaries/presentations Electronic publications Social media Press releases Consultation meetings (virtual/face-to- face) Digital communication tools Grievance Mechanism Poster, brochure, leaflet, etc. SMS Engagement with vulnerable groups will be tailored to ensure safety (in case there are grievances) as well as to enable their views to be captured. 	 Project Affected Parties Disadvantaged/ Vulnerable individuals or groups Other interested parties 	Before the start of implementation of the project, and as needed during the project lifecycle	 MoEUCC PIU Supervision Consultants Contractors
Operation	 GMs Stocktake stakeholders' views and perceptions about the houses constructed (to inform future activities and/or to identify remedial measures if needed) 	 Project outputs Redress of grievances 	 Closing Meeting Consultation meetings Disclosure meetings, Digital Communication Tools/social media Poster, brochure, leaflet, etc. SMS As above on vulnerable groups. 	 Project Affected Parties Disadvantaged/ Vulnerable individuals or groups Other interested parties 	After completion of sub- project activities, during the one-year warranty period	MoEUCC PIUMunicipalitiesUtilities

6.4. REVIEW OF FEEDBACK FROM STAKEHOLDERS

Ongoing feedback and comments received from the stakeholders throughout the project implementation will be reviewed and necessary corrective actions, if needed, will be undertaken by the PIU through its social specialist, environmental specialist and project assistant.

Additionally, the project GM will be in place during the entire lifetime of the project to receive any concerns from both internal and external stakeholders.

7. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT

The PIU to be established under the GDCA will be responsible for the overall implementation of TERRP and also this SEP. The existing PIUs implementing different WB financed projects under the GDCA have qualified technical staff who have experience in managing design, and construction, and it will be strengthened more by hiring additional staff to provide efficient support to the TERRP.

Table 5 given below presents the roles and responsibilities of different parties to be involved in TERRP.

Responsible Party	Responsibilities											
PIU	 Incorporating all stakeholder engagement activities into the overall environmental and social management systems Developing an internal system to communicate progress and results of stakeholder engagement to the senior management and staff members Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues. 											
	 Coordinating the parties for proper implementation of processes related to grievance mechanisms and stakeholder engagement issues 											
Social Specialist (PIU)	 Planning and implementation of the SEP Ensuring that the stakeholder engagement is understood by PIU members and other stakeholders Leading stakeholder engagement activities with identified stakeholders Supporting other PIU staff that may have interaction with stakeholders Coordinating interface and reporting to/from World Bank to implementation of SEP Updating the SEPs periodically and upon major Project changes Acting as the focal point for the GM in the PIU Recording and following up on grievances relevant to the Project Managing and coordinating the resolution of grievances within the Project Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions Coordinating and monitoring GM contact person at consultant and contractor levels Consolidating Project related grievances from all different GM levels Informing the PIU and the management about the resolution process Preparing consolidated GM reports of the Project 											
Environmental Specialist (PIU)	 Monitoring the project's progress Ensuring the successful delivery of all defined documentation Consolidated reporting on overall SEP activities and the project progress Implementing social and environmental monitoring Monitoring and reporting to the PIU and management whether the social and environmental issues stated in related documents are implemented throughout the Project's lifetime 											
Procurement Specialist	 Providing consultancy in tenders to be held within the scope of the Project. Ensuring that the GM and the other environmental and social instruments are incorporated into the tender documents Preparing English and Turkish copies of the tender documents 											

Supervision Consultant	 Preparing respective E&S instruments (ESMP, ESMP Checklist, , , OHS Plan, etc.) for the project activities Ensuring that the project adheres to the methodology and other requirements which are mentioned in E&S Documents (ESMP, OHSP, SEP) during the implementation of sub-projects Monitoring the contractors' activities on site (including recording and resolution of grievances, and reporting these to PIU in their monthly progress reports)
	Contacting with PIU GM Contact Person for the follow-up of the grievances

8. GRIEVANCE MECHANISM

The Grievance Mechanism (GM) is an arrangement that enables any stakeholder to submit their grievances/concerns/suggestions on how the project is planned, constructed, or implemented.

To achieve transparency and accountability and meet the related standards of WB, a project-specific Grievance Mechanism (GM) will be established and will be implemented during the project life cycle.

The goal of the GM is to strengthen accountability to beneficiaries and to provide channels for project stakeholders to provide feedback and/or express their concerns and grievances related to project activities. The GM is a mechanism that allows also for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the GM aims to reduce the risk of the project inadvertently affecting citizens/beneficiaries and serves as important feedback and learning mechanism that can help

improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on their resolution process. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

Within the scope of the TERREP, grievances/concerns/suggestions will be handled at multiple levels: (a) Contractor (b) Construction Supervision (c) Provincial Directorates of Environment, Urbanization and Climate Change (d) MoEUCC/Project Implementation Unit (PIU), (e) national level through existing GMs of the Republic of Turkiye.

- a. Contractor: Each contractor appointed for conducting the civil works will be responsible for receiving, recording and if possible, resolving the concerns and grievances raised by any stakeholder (right holders, local communities, project workers, etc.) due to the civil works executed within the scope of the TERREP. The PIU will also require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, before the start of work. If the Contractor is not able to resolve the concerns and grievances, they are obliged to direct them to the relevant person/institutions. Contractors will also submit the records including solved and unsolved concerns and grievances to the PIU on a weekly basis.
- b. Supervision Consultant: The concerns and grievances that cannot be addressed by the contractor will be dealt with by the Project Manager who is appointed as Supervision Consultant. The Project Manager will remind the responsibilities of the contractor by issuing a status report and ensuring that necessary measures are/will be taken to solve the problem and ensure the implementation of required corrective actions. If the Project Manager is not able to resolve the concerns and grievances, he/she is obliged to direct them to the PIU.
- c. Provincial Directorates of Environment, Urbanization and Climate Change: PDoEUCC will be responsible for taking the necessary measures to address received concerns and grievances regarding the activities carried out within the scope of the TERREP to the extent possible. The Directorates will also immediately forward all received concerns and grievances to the PIU, whether the issues are addressed or not.
- d. MoEUCC/PIU: Within the scope of the TERREP, MoEUCC is responsible to collect, record, and resolve all concerns and grievances raised by stakeholders through the above-mentioned levels. MoEUCC is responsible for resolving the collected concerns and grievances within 15 days and informing the owner of the concerns and grievances about the result.
- National Level. Türkiye has different GMs available at the national level for all individuals residing in the country: Presidency's Communication Center, Foreigners Communication Center (YIMER). The details and communication channels of these mechanisms are provided in the following sections.

8.1. PIU LEVEL GM

The MoEUCC/PIU will operate a website for TERREP where all relevant information is being disclosed for public opinion and review. Through the complaint submissions section and e-mail address (<u>yigmkadev@csb.gov.tr</u>) that will be available on the website, the PIU will be able to collect grievances from all stakeholders. The principle of confidentiality and the right to make anonymous complaints will be ensured. The communication channels for the project-specific GM will be provided in the SEP once it is established.

Grievance/concern/suggestions collected through different channels will be recorded by the MoEUCC and responded to within 15 days. Records of the grievance/concern/suggestion will be shared with WB through the Monitoring Report regularly.

Any comments or concerns can be brought to the attention of the Contractor verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on construction sites that are easily accessible to all relevant stakeholders. The principle of confidentiality and the right to make anonymous complaints will be enabled.

The following timeframe will be used by the Contractor, Supervision Consultant, and MoEUCC/PIU:

- Written acknowledgment of receipt of the grievance: within 5 days of receiving the grievance,
- Proposed resolution: within 30 days of receiving the grievance.
- Specifically, nominated, and trained members of staff will record grievance information in a grievance log. This will include:
- Stakeholder name and contact details. (Personal details will not be shared by third parties or disclosed)
- Details of the grievance and how and when it was submitted, acknowledged, responded to, and closed out.

The Grievance Form for the construction phase of the project (Annex 1) will be revealed on the:

- Websites of the GDCA and/or relevant government authorities, where the project activities will be implemented, and
- Available printed copies on the premises of the relevant buildings/government authorities (when the construction work activities will start) and the premises of the local communities, located near the project areas.

The grievance log will have all the necessary elements to disaggregate the grievance by gender of the person submitting it as well as by type of grievance. Each grievance will be verified in the registry with the following information: a) description of grievance, b) date of receipt of the grievance and when acknowledgment returned to the complainant; c) description of actions taken (investigation, corrective measures, and preventive measures); d) date of resolution and closure provision of feedback to the complainant.

In cases when the grievance/complaint is indefinite or not clear enough, the PIU will assist and provide advice in formulating/redrafting the submission, for the grievance/complaint to become clear, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project.

If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and followup of corrective action within 30 calendar days upon the acknowledgment of the grievance. In the situation when the PIU is not able to address the particular issue verified through the grievance mechanism or if action is not required, PIU will provide a detailed explanation/ justification to the complainant on why the issue was not addressed. The response will also contain an explanation of how the person/ organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory. At all times, complainants may seek other legal remedies by the legal framework of the Republic of Türkiye, including formal judicial appeal.

The GDCA has developed its Grievance Procedure for their ongoing World Bank-financed projects which is provided in ANNEX 4.

8.2. NATIONAL LEVEL GM

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In addition to the above-mentioned communication channels, the stakeholders may also utilize the national level GMs.

8.2.1. PRESIDENCY'S COMMUNICATION CENTER (CIMER)

The CIMER has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

Webpage	www.cimer.gov.tr
Call Center	150
Phone Number	+90 312 525 55 55
Fax Number	+90 312 473 64 94
Mail Address	The Republic of Türkiye, Directorate of Communications

Individual applications at the community relations desks at governorates, ministries and district governorates

8.2.2. FOREIGNERS COMMUNICATION CENTER (YIMER)

The YIMER has been providing a centralized complaint system for foreigners. YIMER will be available to Project stakeholders as an alternative and well-known channel for conveying their Project-related grievances and feedback directly to state authorities.

Webpage	www.yimer.gov.tr
Call Center	157
Phone Number	+90 312 157 11 22
Fax Number	+90 312 920 06 09
Mail Address	The Republic of Türkiye, Directorate of Communications

Individual applications at the Republic of Türkiye General Directorate of Migration Management

8.3. WORLD BANK GRIEVANCE REDRESS SYSTEM

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported

project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB's non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been allowed to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service . Project-affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

8.4. WORKERS' GM

A separate grievance mechanism will be available for the workers, through which they will be able to report working conditions, financial, child/forced labor, legal issues, and other issues such as gender-based discrimination in the workplace, with special attention to sexual harassment. Specifically building awareness and a GM hotline for gender-based violence (GBV) and abuse in the workplace for female workers (both at the construction site and in the buildings under the project) will be emphasized. There will also be awareness-raising discussions with both men and women regarding appropriate workplace behavior.

The MoEUCC/PIU and Supervision Consultant will develop and implement a grievance mechanism for their workforce including sub-contractors, before the start of work. The workers' grievance mechanism will include; (i) a procedure describing the flow of the GM, (ii) timeframes to respond to grievances and to resolve cases, (iii) a register sheet to record and track the timely resolution of grievances; (iv) a contact person responsible to receive, record, address and track resolution of grievances. The workers of the Consultant and Contractor will apply to PIU for their grievances through the project website.

The Supervision Consultant and Contractors will record, and solve the grievances of workers and report to PIU in monthly progress reports. The process will be monitored by the GM Contact person in the MoEUCC. PIU will also record and resolve the grievances of its employees and compile all data gathered from different levels (Supervision Consultants and Contractors) in a central log.

The workers will be informed about the existence of the grievance mechanism which will be available to all project workers (direct and contracted; including the PIU staff) through notice boards, the presence of "suggestion/complaint boxes" at the site, and other means as needed. Besides, the workers' grievance mechanism will be described during the staff induction trainings, which will be provided to all project workers.

The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file 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

Information about the existence of the workers' grievance mechanism will be available to all project workers (direct, contracted,) through notice boards, the presence of "suggestion/complaint boxes" at, the call center, announcements during training, seminars, meetings, access link on the main page of project website, project printed materials that will be distributed to workers, social media and other means as needed. The

Project grievance mechanism will not prevent project workers to use other judicial or administrative remedies available under the law.

The project and workers' grievance mechanism will be established by Project effectiveness.

GDCA will develop and adapt its current grievance and complaints procedures and mechanisms for the project's necessities. The PIU will be responsible for managing the grievance mechanism and responding to grievances and complaints received in the scope of the Project.

In addition, the project GM will include a channel to receive and address confidential complaints related to Sexual Exploitation, Abuse/Sexual Harassment, and lack of Covid-19 measures with special measures in place.

8.5. MANAGEMENT OF SEXUAL EXPLO AND ABUSE/SEXUAL HARASSMENT ISSUES

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

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

8.6. GM PROCEDURE

8.6.1. GRIEVANCE LOG

The PIU's Social Expert and contact person will keep a central log and will ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. The log should contain the following information:

- Owner of the complaint, his/her location, and details of his/her complaint,
- Date of reporting by the complaint,
- Date when the Grievance Log was uploaded onto the project database,
- Details of corrective action proposed, name of the approval authority,
- Date when the proposed corrective action was sent to the complainant (if appropriate),
- Date when the complaint was closed out,
- Date when the response was sent to the complainant.

The Supervision Consultant and the Contractor will maintain local grievance logs to ensure that each complaint has an individual reference number and is appropriately tracked, and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type of appeal,
- Category of appeal,
- People responsible for the execution of the appeal,
- Deadline for resolving the appeal,
- Agreed action plan.

a. MONITORING AND REPORTING ON GRIEVANCES

Monitoring and evaluation of the stakeholder process are important to ensure PIU can respond to identified issues and alter the schedule and nature of engagement activities to make them more effective. The following characteristics/commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement,
- Inclusivity (inclusion of key groups) of interactions with stakeholders,
- Promotion of stakeholder involvement,
- Sense of trust in GDCA shown by all stakeholders,
- Clearly defined approaches, and
- Transparency in all activities.

PIU will prepare Monitoring Reports to be submitted to WB in 6 monthly periods. The supervision Consultant will be responsible for:

- Collecting data from the Contractors on the number, substance, and status of complaints and uploading them into a single regional database,
- Maintaining the grievance logs on the complaints received at the regional level,
- Monitoring outstanding issues and proposing measures to resolve them, and
- Submitting quarterly reports on GM to the PIU.

PIU within the GDCA will submit biannual reports to the WB, which shall include a section related to GM including updated information on the following:

- Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.),
- Qualitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback), highlighting those grievances related to the WB ESS 2 and the number of resolved grievances,
- Quantitative data on the type of grievances and responses, issues provided, and grievances that remain unresolved,
- Level of satisfaction by the measures (response) taken,
- Any correction measures are taken.

The PIU's Social Expert will be responsible for:

- Summarizing and analyzing the qualitative data received from different levels on the number, substance, and status of complaints and uploading them into the single project database,
- Monitoring outstanding issues and proposing measures to resolve them.

The PIU will be the focal point for GM and be responsible for the monitoring of all Project related stakeholder engagement activities, ensuring the fulfillment, and updating of this SEP, and reporting to the stakeholders.

ANNEX 1. GRIEVANCE FORM

Reference No		
Full Name (not mandatory, you can		
submit anonymously)		
Please mark how you wish to be		
contacted (by mail, telephone, or e-		
mail).		
Province/District/ Location		
Date		
Category of the Grievance		
1. On abandonment (public)		
2. On assets/properties impacted by the		
3. On infrastructure		
4. On decrease or complete loss of sour		
5. On environmental issues (ex. pollution		
6. On Employment		
7. On traffic, transportation, and other ris	sks	
9-Other (Please specify):		
-	happen? When	did it happen? Where did it happen? What is
the result of the problem?		
What would you like to see happen to	o resolve the pro	blem?
		ry, it should be kept in mind that during the problems may occur due to a lack of
information.		,

Signature:

ANNEX 2. GRIEVANCE CLOSEOUT FORM

Grievance closeout number:					
Define immediate action required:					
Define long-term action required					
(if necessary):					
Compensation Required?	[]YES	[]NO			
CONTROL OF THE REMEDIATE A	CTION AND THE DECISION				
Stages of the Remediate Action		Deadline and Responsible			
Slages of the Remediate Action		Institutions			
1.					
2.					
3.					
4.					
5.					
6.					
7.					
8.					

COMPENSATION AND FINAL STAGES

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

Notes:

[Name-Surname and Signature]

Date: ___ / ___ / ____

Of the Complainant:

Representative of the Responsible Institution/Company [Title-Name-Surname and Signature

ANNEX 3	B. GRIEVANCI	ELOG		1																
Grievance and Suggestion Register Number	Details on	ion In-	About the Complainant			About the Complaint/Suggestion					Action Taken						Supporting Documents for Grievance/Sugg estion Close- Out Where appropriate/pos sible: photograph, official confirmation letter, etc. If users/beneficiari es of the buildings have had any accident or damage, all relevant documents should be recorded.	Please provide details If the Complaint could not be Closed/Resolved (referral was made to another institution/perso n etc.)		
	How Complaint is Received (Grievance Form, Community Meeting, Telephone, Alo 181, etc.) Date of Complaint Received	Person Receiving Complaint/Suggestion Name/Surname and Position Level of Grievance (Contractor, MoEUCC Provincial Directorate Level, PIU Level, Ministerial Level, etc.)	Level of Grievance (contractor, supervision consultant, provincial directorates, Ministry, Alo 181, etc.)	Name and Surname of the Complainant*	Gender of the Complainant	Complainant's E-mail*	Complainant's Phone Number*	Province in which the C/S is Relevant	Building/Institution Related to Complaint/Suggestion (Sub-Project)	Project Component Related to Complaint/Suggestion	Complaint Category (Renovation-related, environmental issues, restriction of access to building entrances, damage, complaints about workers, accidents, working conditions, employee rights, sexual exploitation and abuse, sexual harassment, etc.) Summary of Complaint/Suggestion		The date when the complainant is informed that the complaint/suggestion has reached the system and is under evaluation	Status of the Complaint Open, Closed, Pending	Person/Department to whom Complaint/Suggestion is directed	Action Planned	Due Date for Addressing the Grievance	Closed Date of Grievance		

ANNEX 4. EXISTING GDCA GRIEVANCE MECHANISM

Introduction

The Grievance Mechanism (GM) is a process that enables any stakeholder to submit a complaint or a suggestion about how the project is being planned, constructed, or implemented.

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective, and lasting outcomes. It also builds trust and cooperation, which forms an integral part of the more detailed community consultations that will pave the way for corrective action, as well as builds stakeholder engagement and ownership of the project. Specifically, the GM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;
- Supports accessibility, anonymity, confidentiality, and transparency in handling complaints and grievances; and
- o Reduces the need to resort to judicial proceedings.

The operational flow of the Grievance Mechanism for the stakeholders is given in Figure 3.



Figure 3. Operational Flow of Grievance Mechanism

The overall process for the GM usually is described in detail in the Project Operational Manual (POM) and is comprised of 6 steps: (1) uptake; (2) sorting and processing; (3) acknowledgment and follow-up; (4) verification, investigation, and action; (5) monitoring and evaluation; and (6) feedback.

Purpose

The GM can be used to enable the stakeholders to raise any type of requests (complaints, compliments, feedback, inquiries for information, etc.) related to the overall management and implementation of the project, as well as issues about services that are being financed and supported by the project, including:

- mismanagement, misuse of Project Funds, or corrupt practices,
- violation of project policies, guidelines, or procedures, abuse or any misbehavior/misconduct [including sexual exploitation and abuse/sexual harassment (SEA/SH)]¹ in the workplace),

¹ Measures to be taken in the context of the consent of the survivor in the future complaints on sensitive issues such as this will be carried out on the basis of the principle of confidentiality and by putting the safety of the survivor at the center.

- disputes relating to resource use restrictions that may arise between or among affected communities, and
- grievances that may arise from members of communities who are dissatisfied with the project activities, or actual implementation of the project.

The GM will establish clearly defined timelines for acknowledgment, update, and final feedback to the complainant. These timelines will be disseminated widely to Project stakeholders.

Scope

The GM will be accessible to a wide range of Project stakeholders who are likely to be directly or indirectly affected by the Project. These will include beneficiaries, staff (including PIU members), administrations, users of reconstructed housing and the wider public, and project implementers (Supervision Consultants, contractors, etc.). All of them will be encouraged to submit their complaints and feedback to the GM. In addition, care will be taken to ensure that the grievance mechanism is accessible to vulnerable groups.

Responsible Parties

Ministry of Environment, Urbanization and Climate Change/Project Implementation Unit (MoEUCC/PIU) would assume overall responsibility for the GM and serve as the main implementing agency. For this mechanism to function in a proper and timely manner, PIU will also assign a GM contact person.

The GM contact person who will oversee the entire process will be assigned as a part of the project team of the MoEUCC. GM's Contact Person (Social Expert) 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 GM to ensure its smooth functioning within the scope of the project.

Table 6 presents the responsible parties and their roles/responsibilities for the GM implementation.

Responsible Party	Responsibilities
Ministry of Environment, Urbanization and Climate Change/Project Implementation Unit (MoEUCC/PIU)	 The PIU will be responsible for the overall implementation, management, and coordination of this Standard Operating Procedure (SOP). PIU will also guide and assist the relevant responsible parties to ensure the successful implementation of this SOP. PIU will be responsible for continuous monitoring of each process of the stakeholder's requests to assure compliance with the GM Procedure.
GM Contact Person of the PIU	 Acting as the GM contact person in the PIU. Reviewing, and classifying whether the grievances are genuine/eligible and related to Project activities or not together with relevant member(s) of the PIU. Establishing the main register and monitoring system for this SOP and following up on all grievances relevant to the Project. Managing and coordinating the resolution of grievances within the Project. Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding stakeholder engagement and other Project activities and coming up with actions. Coordinating and monitoring the GM contact persons at the Contractor level. Informing the PIU and the management about the resolution process.

 Table 6. Responsible Parties in Grievance Mechanism Implementation at Each Defined Level

	Preparing consolidated GM reports of the Project.
GM Contact Person of the (Provincial Directorate of Ministry of Environment and Urbanization (PDoMoEUCC)	 Receiving project-related requests (complaints, compliments, feedback, inquiries for information, etc.). Evaluating and addressing the complaints that fall into their area of responsibility by taking confidentiality and security measures. Recording each request whether they are addressed or not on the register and monitoring system and convey the register log to the MoEUCC monthly. Immediately notifying the MoEUCC/PIU if complaints have great significance (sexual abuse, workplace accident, etc.).
Social Specialists Supervision Consultants	 Evaluating and addressing the received applications together with the Contractor's Social Specialist/OHS Specialist or if deemed necessary the management of the contractors' and the Project Managers (of supervision consultants) will involve in the resolution process of the applications. Monitoring the contractors' recording and resolution of grievances and reporting these to PIU in their monthly progress reports.

Dissemination of the Grievance Mechanism

MoEUCC will provide leaflets and other means of information (official letters, notice boards, the official website of MoEUCC, consultation meetings, etc.) to inform the communities affected by the Project.

The Grievance/Suggestion Form for the project will be publicly available on the project website, on the webpage of the relevant government institutions, and the construction sites of the sub-projects.

MoEUCC/PIU will also conduct some GM consultation meetings with representatives of the beneficiaries, the supervision consultants, and contractors.

During the implementation of the Project, once the civil works commence, printed copies of the Grievance/Suggestion Form will also be available in the buildings/government authorities included in the Project and at the PDoEUCCs.

Submission of a Request

Who May Use the Grievance Mechanism?

The targeted audiences of the GM include but are not limited to are:

- Project's beneficiaries;
 - Right owners affected by the earthquakes
- Communities that could potentially be affected by the construction/renovation/retrofitted activities at the buildings (visitors, surrounding residences, etc.)
- Employees of Contractors and Supervision Consultants
- Members of the PIU
- Other parties (NGOs, etc.)

The GM will allow anonymous applications through its different request/suggestion/grievance intake channels established within the scope of the project. In case, the request/suggestion/grievance is submitted anonymously, the same process will be followed as a non-anonymous request. However, since no contact information can be recorded in anonymous requests/suggestions/grievances, the applicants should be informed that information on how the grievance process will end cannot be transmitted.

How to Submit a Request?

The Ministry of Environment, Urbanization and Climate Change (MoEUCC) have a hotline `Alo181` which is accessible via phone and website. This hotline serves also as a ministerial-level grievance mechanism for its employees, partners, and the wider public. Requests/suggestions/grievances about all environmental and urban services provided by MoEUCC are responded to by a professionally managed call center.

MoEUCC Call Center	Alo 181
Telephone	+ 90 312
Grievance Forms	https://kadiyap.csb.gov.tr/
E-mail	yigmkadev@csb.gov.tr
Provincial Directorates of Environment, Urbanization And Climate Change (PDoEUCC)	Alo 181 TERRP Grievance Forms are disclosed on the official webpage of the respective PDoEUCC.
Contractors	Forms that are available at construction sites (Annex 1-2)

The applicants can submit their request/suggestion/grievance in any of the ways NGOd below:

In addition to the above-mentioned communication channels, the stakeholders may also utilize the Presidency's Communication Center (CİMER) to submit their concerns and grievances about the project implementation. The communication channels of CİMER are given below.

Grievance Mechanism Process

Webpage	https://www.cimer.gov.tr
webpage	https://giris.turkiye.gov.tr/
Hotline	Alo 150
Phone	+90 312 590 2000
Fax	+90 312 473 6494

Within the scope of the TERRP, requests/suggestions/grievances will be handled at different levels: (a) contractor level; (b) construction supervision level; (c) MoEUCC Provincial Directorates level; (d) national level MoEUCC Project Implementation Unit (PIU).

- a) Contractor Level: Each contractor appointed for conducting the civil works will be responsible for receiving, recording and if possible, resolving the concerns and grievances raised by any stakeholder (right owners, host communities, project workers, etc.) due to the civil works executed within the scope of the TERRE Project. The PIU will also require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, before the start of work. If the Contractor is not able to resolve the concerns and grievances, they are obliged to direct them to the relevant person/institutions. Contractors will also submit the records including solved and unsolved concerns and grievances to the Supervision Consultant weekly.
- b) Construction Supervision Level: The concerns and grievances that cannot be addressed at the contractor level will be dealt with by the Project Manager who is appointed as Construction Controller. The Project Manager will remind the responsibilities of the contractor by issuing a status

report and ensuring that necessary measures are/will be taken to solve the problem and ensure the implementation of required corrective actions. If the Project Manager is not able to resolve the concerns and grievances, he/she is obliged to direct them to the MoEUCC. Besides, Supervision Consultant will also submit the records including solved and unsolved concerns and grievances to the MoEUCC on a monthly basis.

- c) Provincial Directorates of Environment, Urbanization and Climate Change Level: Provincial Directorates of Environment, Urbanization and Climate Change will be responsible for taking the necessary measures to address received concerns and grievances regarding the activities carried out within the scope of the TERRE Project to the extent possible. The Directorates will also immediately forward all received concerns and grievances to the MoEUCC, whether the issues are addressed or not.
- d) MoEUCC Level: Within the scope of the TERRE Project, MoEUCC is responsible to collect, record, and resolve all concerns and grievances raised by stakeholders through the above-mentioned levels. MoEUCC is responsible for resolving the collected concerns and grievances within 30 days and informing the owner of the concerns and grievances about the result.

Registration

The requests/suggestions/grievances raised by any stakeholder (including but not limited to; workers of the TERRE Project, right owners, surrounding residents, , etc.) due to the executed civil works will be logged in the Grievance Table (Annex 3) within 3 business days from the date of receipt by PIU, Consultants, and PDoEUCC.

The grievance contact person (supervision consultant and PDoEUCC) may delegate responsibilities to other staff, but is ultimately responsible for:

- Investigating the grievance,
- Consulting relevant technical persons within the project,
- Defining and implementing resolution actions,
- Making sure resolution actions are completed,
- Tracking the progress of individual grievances,
- Informing the Complainant once the grievance is registered in the system and then when the grievance is resolved,
- Documenting resolution actions, and
- Gaining necessary approvals from and reporting to relevant management.

The anonymous grievances will be logged and reported with other grievances to facilitate continuous improvement of the GM and project implementation. To ensure the confidentiality and life safety of the survivor's identity info, necessary measures will be taken to log in to the system (where the complaint mechanism is followed) with a username and password, especially in cases of gender-based violence, sexual exploitation, and harassment.

The Supervision Consultant will record the request/suggestion/grievance through the Grievance/Suggestion Form and the Grievance Close-Out Form (provided in Annex 1 and 2 respectively). Verbal requests/suggestions/grievances will be recorded by the responsible personnel of the Supervision Consultant by filling out the Grievance and Suggestion Form. The Supervision Consultant is obliged to send the record of the request/suggestion/grievance to the PIU monthly.

Grievance Registration Process of Alo 181

Headquarters of ALO 181 has been informed about the TERRE Project and it currently receives, and records all inquiries received on TERRE Project and conveys them to the PIU of the TERRE Project. The officer of ALO 181 will record the grievance and will ask the complainant if a response is requested or not. If the complainant requests feedback about the result of her/his complaint, then the complainant is asked to provide her/his phone or e-mail information. Even if the complainant would prefer to stay anonymous,

her/his complaint is recorded by the representative of ALO 181. Thereafter, all types of recorded complaints will be sent to the relevant department of MoEUCC.

Assessment, Addressing, and Closure Process of the Requests

The complaints will be registered within three (3) business days from the date of receipt. During these three (3) days, grievances will be reviewed to be classified whether they are genuine and related to Project activities or not by the responsible person. If the issues/disputes raised are not related to the Project, guidance is provided to the Complainant to contact the relevant party.

The requests will be addressed, and corrective actions will be taken to resolve the complaint within *15 working days*. If the resolution period takes more than 15 days (the resolution period will take a maximum of 30 calendar days) this should be agreed upon between the Supervision Consultant/PIU and the complainant. The applicant should be informed about the closure of the request.

All parties of GM are responsible for assigning a grievance owner to liaise with the stakeholder/s and work on a resolution. Grievances will be screened to determine who the responsible party for further assessment will be and how the grievance is approached. Steps to be taken for assessing, addressing, and closing the request at each level of GM are provided in Table 7.

Table 7. Steps to be taken for Assessing, Addressing, and Closing the Request for all parties of GM

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
	If an answer/ corrective action can be provided immediately	Social Specialist of the Contractor	If the complaint is verbal, it will be recorded in Grievance/ Suggestion forms (this action will be taken for all types of grievances). The social specialist will draft a response with explanations of corrective actions. Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.	Management of Contractor	If the complainant is satisfied with the answers and actions are taken, the Close- Out Form with corrective actions and explanations will be signed by the complainant.	 Further assessment will be taken by the PIU. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
Contractor Level	If it cannot be ensured whether the complaint is eligible or not	Management of Contractor	Further-assessment will be made by the management. If the management decides the grievance is relevant to TERRE Project activities and is eligible for assessment, the Social Specialists of the Contractor will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken. Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant. If the management decides the complaint is NOT relevant to TERRE Project activities, the Complainant will be informed; accordingly, guidance will be provided to contact the relevant party(-ies).	Management of Contractor	If the complainant is satisfied with the answers and actions are taken, the Close- Out Form with corrective actions and explanations will be signed by the complainant.	 If the complaint is eligible and there is disagreement, then further assessment will be taken by the PIU. A site visit would be held to collect more information about the issue/dispute, if appropriate. Virtual or face-to-face meetings would be conducted with the complainant in order to propose another corrective action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	If the submitted grievance or concern is indefinite or is not clear enough	Social Specialist of the Contractor	Social Specialists of the Contractor will assist and provide advice in formulating/ redrafting the submission, to ensure that the grievance is clear enough for assessment in the best interests of persons affected by the Project. After necessary revisions are made to the complaint to ensure it is detailed enough for assessment and the complaint is assessed; feedback including necessary actions taken will be sent to the complainant.			 Once the submitted request is clarified to be assessed under the Project's GM and if there is still a disagreement with the actions taken, <u>f</u>urther assessment will be taken by the PIU. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	If the issues/disputes are related to the project but cannot be addressed at the contractor level	Management of Contractor and Project Manager of the Supervision consultant	Draft assessment will be sent to the GM contact person of the PIU by the Supervision Consultant. Considering the draft assessment shared by the Supervision Consultant, the GM contact person of the PIU will draft a response with explanations and corrective actions to be taken.	PIU/MoEUCC	If the complainant is satisfied with the explanation provided and actions are taken, the Close-Out Form with corrective actions and explanations will be	 If there is still a disagreement with the actions taken, <u>f</u>urther assessment will be taken by the PIU. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant in order to propose another corrective action, if possible. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
			The final response will be prepared and shared with the complainant.		signed by the complainant.	 The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	Ombudsman https://ebasvuru.ombudsman.gov
	When a contractor's worker issues a complaint	Social Specialists of the Contractor	The complaint will be directed to the management of the contractor. The Project manager of the supervision consultant will be immediately informed about the grievance received. If the grievance can be resolved immediately, the Contractor will identify and take necessary actions. If not, the grievance will be escalated to the Supervision Consultant and/or the PIU for necessary actions to be identified and taken. If the grievance is repetitive, extensive, and high-profile that may jeopardize the Project or the reputation of the Bank then the grievance will be escalated to the PIU and necessary actions to be taken will be identified. The response with the appropriate solution and actions to be taken will be prepared and shared with the complainant.	Project Manager of Supervision Consultant	If the worker is satisfied with the explanation provided and actions are taken, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	In case of disagreement, the complaint will be directed to the PIU. PIU will organize a meeting with the worker to further assess potential corrective actions that can be taken and additional information to be provided, as appropriate. If the worker is still dissatisfied with the recommended additional actions or explanation, s/he will be informed about the appeal process.	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
Supervision Consultant	When Supervision Consultant's worker issue a complaint	Project Manager and/or headquarter of Supervision Consultant	If the grievance can be resolved immediately, the Project Manager or the HQ of the Supervision Consultant will identify and take necessary actions. If not, the grievance will be escalated to the PIU for necessary actions to be identified and taken. If the grievance is repetitive, extensive, and high-profile that may jeopardize the Project or the reputation of the Bank then the grievance will be escalated to the PIU and necessary actions to be taken will be identified. The response with the appropriate solution and actions to be taken will be prepared and shared with the complainant.	Project Manager of Supervision Consultant PIU/MoEUCC	If the worker is satisfied with the explanation provided and actions are taken, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	 A virtual or face-to-face meeting would be conducted with the worker to discuss, propose and agree on any other correction actions. If the agreement is ensured, the proof documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the worker. If the worker is still dissatisfied with the recommended actions of explanation, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
Provincial Directorate of EUCC	If the complaint is related to the activities of an ongoing sub- project	Contact person of the PDoEUCC	In case an answer/corrective action can be taken immediately; the responsible person will take the required corrective action to resolve the grievance and inform the PIU/MoEUCC about the grievance and the corrective action taken via GM Register Table. Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.	The contact person of the PDoEUCC	If the complainant is satisfied with the explanation provided and corrective actions are taken, the Close-Out Form including the corrective actions and explanations will be signed by the complainant.	 If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUCC for further assessment. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
PIU/MoEUCC	When an answer/ corrective action can be provided immediately.	Contact Person of the PIU	If the complaint is verbal, it will be recorded in an online Grievance &Suggestion form (this action will be taken for all types of grievances). Feedback including explanation and corrective necessary actions to be taken will be prepared and shared with the complainant by the GM contact person of the PIU.	PIU/MoEUCC	If the complainant is satisfied with the explanation provided and corrective actions are taken, the Close-Out Form including the corrective actions and explanations will be signed by the complainant.	 If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUCC for further assessment. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	If it cannot be ensured whether the complaint is eligible or not	PIU/MoEUCC	Further-assessment will be made by PIU/MoEUCC. If the PIU & MoEUCC decides the grievance is relevant to TERRE Project activities and is eligible for assessment, the PIU focal point will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken. Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant. If the PIU & MoEUCC decides the grievance is NOT relevant to TERRE Project activities and is NOT eligible for assessment, the Complainant will be informed; accordingly, guidance will be provided to contact the relevant party(-ies).	PIU Director	Feedback including necessary actions taken will be sent to the complainant. If the complainant is satisfied with the answers and actions are taken, the Close- Out Form with corrective actions and explanations will be signed by the complainant.	 If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUCC for further assessment. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another correction action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	When the submitted grievance or concern is indefinite or not clear enough	GM Contact Person of the PIU	The GM Contact Person of PIU (Social Specialist) will assist and provide advice in formulating/ redrafting the submission, to ensure that the grievance is clear enough for assessment in the best interests of persons affected by the Project. After necessary revisions are made to the complaint to ensure it is detailed enough for assessment and the complaint is assessed; feedback including necessary actions taken will be sent to the complainant.	PIU Director	If the complainant is satisfied with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	 Once the submitted request is clarified to be assessed under the Project's GM and if there is still a disagreement with the actions taken, <u>f</u>urther assessment will be taken by the PIU. A site visit would be held to collect more information about the issue/dispute, if appropriate. A virtual or face-to-face meeting would be conducted with the complainant to propose another corrective action, if possible. The final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant. If the agreement is ensured, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by the complainant. If the complainant does not satisfy with the solution, s/he will be informed about the appeal process. 	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov
	When member/s of PIU issue a complaint	MoEUCC General Directorate of Personnel	The PIU member will submit their grievances to the General Directorate of Personnel with a petition. The General Directorate of Personnel will forward the grievance to any other department (rather than the "Internationally Funded Seismic Retrofitting Department") within the Ministry.	General Manager of GDCA	If the complainant is satisfied with the answers and is taken action, the Close-Out Form with corrective actions and explanations will be signed by the complainant.	• If the complainant does not satisfy with the solution, s/he is informed about the appeal proses	 CIMER Civil Courts of First Instance Administrative Court Commercial Courts of First Instance Labor Courts Ombudsman https://ebasvuru.ombudsman.gov

Grievance/ Suggestion Receiving Part	Description	Assessing Body	Action to be taken for addressing the grievances	Approval Body	Closure	Action to be taken in case of disagreement	Appeal Authorities
			This department will select an "Assessor". Assessor will evaluate the grievance, make necessary inquiries, and reveal a summary report with corrective action(s). A summary report will be assessed by the Head of the Department of <i>Internationally Funded Seismic Retrofitting</i> <i>Department- General Directorate of Construction Affairs</i> (<i>IFSRDGDCA</i>). General Manager will make a final decision and the complainer will be informed about the decision.				

Contact persons will lead grievance investigation, when needed, which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities. Investigation findings will be used to document the decision-making process and inform proposed remedies.

Feedback

If the grievance has not been resolved, the GM's Contact Person (Social Specialist) of PIU will make a statement summarizing the corrective actions taken and inform the complainant of the resolution and other alternatives, if any, including legal alternatives.

Right to Appeal

Applicants whose complaints could not be resolved through existing GM or whose complaints contain sensitive issues can always apply to the relevant legal institutions. Such institutions can be summarized as follow:

- CİMER
- Civil Courts of First Instance,
- Administrative Court,
- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (https://ebasvuru.ombudsman.gov.tr)

World Bank Grievance Service

Individuals or communities who believe that they are adversely affected by the projects implemented by the Ministry of Environment, Urbanization, and Climate Change and financed by WB can send their complaints to d the Ministry or the World Bank's Grievance Service (GS). (<u>https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service</u>) GS ensures that the received grievances are quickly examined to eliminate project-related concerns.

Project-affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints.

Monitoring

As part of project progress reports, GM's effectiveness will be monitored, evaluated, and reported to the Bank regularly. The statistics of the grievances should be reported to the WB every six months in project progress reports.

Several Key Performance Indicators (KPIs) will also be monitored and integrated into the project progress report by the project regularly, including the following parameters:

- (i) Number of public grievances received within a reporting period (i.e. monthly);
- (ii) Number and percentage of those resolved within the prescribed timeline;
- (iii) Number of grievances that are open more than 30 days with reasons explained;

Reporting

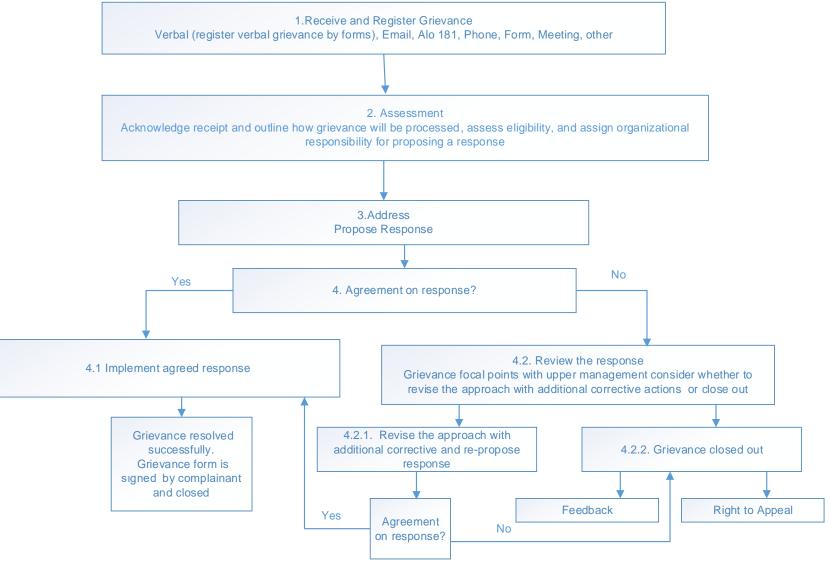
Responsible parties regarding GM reporting and requirements on reporting process are provided in Table 3.

Responsible Party	Reporting Process Requirements			
Social Specialists of the Contractor	Submit Monthly Reports to the Project Manager of Supervision Consultants, which shall include a Grievance Table as an annex related to GM including updated information on the following:			
	 Quantitative data on the number of received applications (suggestions, complaints, requests, positive feedback), and the number of resolved grievances, Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, Summary of corrective measures taken, Disaggregated data (gender, province, etc.) about the received grievances. 			
Building Administration	Inform and update the PIU/MoEUCC/Project Manager of Supervision Consultant weekly, in case any grievances are submitted to the Building Administration and conveyed via CIMER.			
Supervision Consultants	Submit Monthly Reports to the PIU, which shall include the contractor's report including,			
	 Quantitative data on the number of received grievances (applications, suggestions, complaints, requests, positive feedback), and number of resolved grievances, Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, summary of corrective measures taken, Disaggregated data (gender, province, etc.) about the received grievances. 			
PDoEUCC	Submit the Grievance Table to the PIU on a weekly basis.			
The PIU's GM contact person	 Submit Quarterly Reports to the PIU, which shall include the following items related to the management of the received grievances, Quantitative data on the number of received applications (suggestions, complaints, requests, positive feedback) from various intake channels (PDoEUCC, PIU, meetings, scorecards, Alo 181, online forms, etc.) and the number of resolved grievances, Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, 			

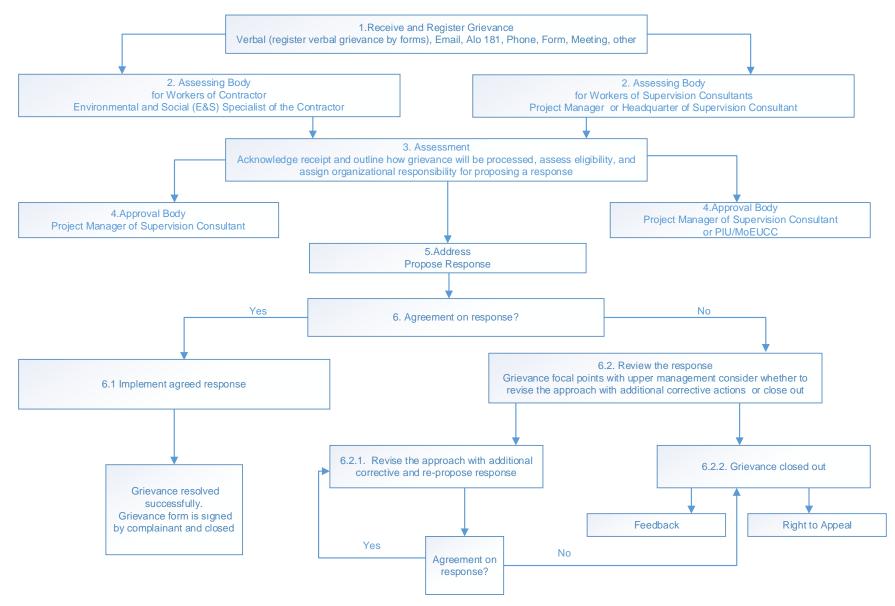
Table 8: GM Reporting and Requirements on Reporting Process

	 Disaggregated data (gender, province, etc.) about the received grievances.
MoEUCC/PIU	 Submit biannually reports to the WB, which shall include a Grievance Table as an annex (Annex 2) related to the GM including updated information on the following: Status of GM implementation (procedures, training, public awareness campaigns, budgeting, etc.), Quantitative data on the number of received applications (, suggestions, complaints, requests, positive feedback), and the number of resolved grievances, Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken, Summary of corrective actions taken, Disaggregated data (gender, province, etc.) about the received grievances.

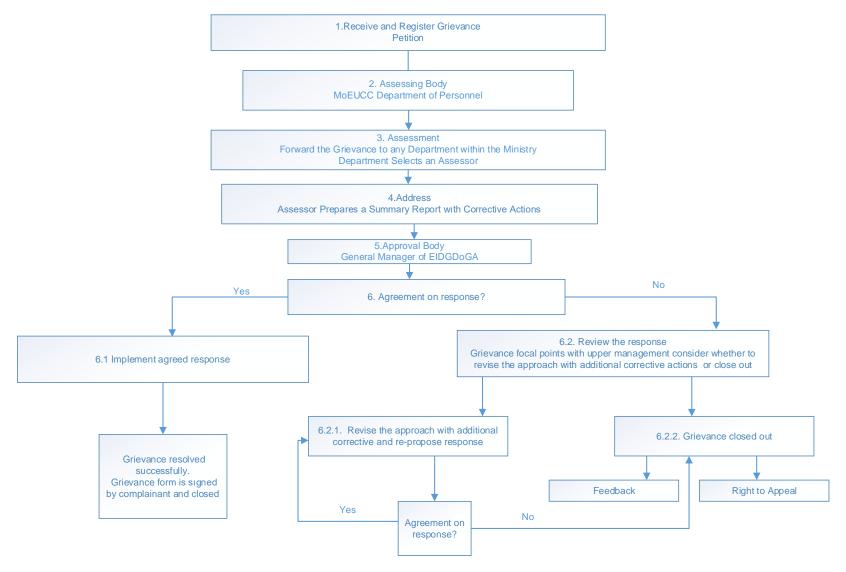
GRIEVANCE MECHANISM FLOWCHART



WORKERS' GRIEVANCE MECHANISM FLOWCHART



PIU GRIEVANCE MECHANISM FLOWCHART



ANNEX 5. Photos of the Meetings

Gaziantep, 27.02.2023





HATAY- Kırıkhan, Antakya, İskenderun, 28.02.2023







Hatay Centrum, 02.03.2023







Hatay, Defne-02.03.2023





Adıyaman, 02.03.2023





Karamanmaraş-05.03.2023



Malatya-07.03.2023



Malatya-Akçadağ-17.03.2023

