



**Republic of Türkiye**

**Ministry of Environment, Urbanization and Climate Change**

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

**STAKEHOLDER ENGAGEMENT PLAN (SEP)**

**DRAFT DOCUMENT**

**MARCH 2023**

# Table of Contents

<b>1. INTRODUCTION</b>	<b>5</b>
<b>2. PROJECT DESCRIPTION</b>	<b>6</b>
<b>2.1. PROJECT OBJECTIVE</b>	<b>6</b>
<b>2.2. PROJECT COMPONENTS</b>	<b>6</b>
<b>2.3. PROJECT LOCATION</b>	<b>7</b>
<b>3. REGULATORY CONTEXT</b>	<b>8</b>
<b>3.1. NATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT</b>	<b>8</b>
<b>3.2. INTERNATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT</b>	<b>10</b>
<b>4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES</b>	<b>11</b>
<b>5. STAKEHOLDER IDENTIFICATION (MAPPING)</b>	<b>11</b>
<b>5.1. AFFECTED PARTIES</b>	<b>13</b>
<b>5.2. OTHER INTERESTED PARTIES</b>	<b>13</b>
<b>5.3. DISADVANTAGED / VULNERABLE INDIVIDUALS OR GROUPS</b>	<b>14</b>
<b>6. STAKEHOLDER ENGAGEMENT PLAN</b>	<b>14</b>
<b>6.1. PROPOSED STRATEGY FOR INFORMATION DISCLOSURE AND CONSULTATION</b>	<b>18</b>
<b>6.2. PROPOSED STRATEGY TO INCORPORATE THE VIEW OF VULNERABLE GROUPS</b>	<b>19</b>
<b>6.3. REVIEW OF FEEDBACKS FROM STAKEHOLDERS</b>	<b>19</b>
<b>7. IMPLEMENTATION ARRANGEMENTS FOR STAKEHOLDER ENGAGEMENT</b>	<b>19</b>
<b>8. GRIEVANCE MECHANISM</b>	<b>20</b>
<b>8.1. Workers' GM</b>	<b>22</b>
<b>8.2. GRIEVANCE LOG</b>	<b>23</b>
<b>8.3. MONITORING AND REPORTING ON GRIEVANCES</b>	<b>24</b>
<b>9. Disclosure of ESF Documents and Consultation Meeting</b>	<b>25</b>
<a href="#">Annex-1. Grievance Form</a>	<a href="#">28</a>
Annex-2. Grievance Closeout Form	29
<a href="#">Annex- 3. Grievance Log</a>	<a href="#">30</a>
Annex- 4 Existing GDCA Grievance Mechanism	30
Annex- 5 Photos of Stakeholder Engagement Meeting	49

## List of Tables

<b>Table 1</b> Potential interests and influence for each of affected parties .....	123
<b>Table 2</b> Other interested parties.....	134
<b>Table 3</b> Identified vulnerable groups and the way of communication.....	145
<b>Table 4</b> Stakeholder Engagement Techniques for each stakeholder group.....	<b>Hata! Yer işareti tanımlanmamış.6</b>
<b>Table 5</b> Summary of the Questions and Answers Session.....	25

## List of Figures

<b>Figure 1. Cities for possible sub-project pipeline .....</b>	<b>Hata! Yer işareti tanımlanmamış.</b>
---	---

## Annexes

Annex- 1 GRIEVANCE FORM .....	278
Annex- 2 GRIEVANCE CLOSEOUT FORM .....	29
Annex- 3 Grievance Log.....	27
Annex- 4 Existing GDCA Grievance Mechanism .....	31
Annex- 5 Photos And Participant List of Stakeholder Engagement Meeting.....	50

## ABBREVIATIONS AND ACRONYMS

<b>CIMER</b>	The Communication Center of the Presidency
<b>DSI</b>	Design, Supply, Installation
<b>EE</b>	Energy Efficiency
<b>EEPB</b>	Energy Efficiency in Public Buildings
<b>E&amp;S</b>	Environmental and Social
<b>ESCP</b>	Environmental and Social Commitment Plan
<b>ESF</b>	World Bank Environmental and Social Framework
<b>ESMF</b>	Environmental and Social Management Framework
<b>ESMP</b>	Environmental and Social Management Plan
<b>ESS</b>	Environmental and Social Standards
<b>EU</b>	European Union
<b>GBV</b>	Gender Based Violence
<b>GDCA</b>	Directorate General of Construction Affairs
<b>GHG</b>	Greenhouse Gas
<b>GM</b>	Grievance Mechanism
<b>GRS</b>	Grievance Resolution Service
<b>IIP</b>	Independent Inspection Panel
<b>LMP</b>	Labor Management Procedures
<b>MoAF</b>	Ministry of agriculture and forestry
<b>MoENR</b>	Ministry of Energy and Natural Resources
<b>MoEUCC</b>	Ministry of Environment, Urbanization and Climate Change
<b>MoH</b>	Ministry of Health
<b>MoT</b>	Ministry of Trade
<b>MoYS</b>	Ministry of Youth and Sports
<b>NEEAP</b>	National Energy Efficiency Action Plan
<b>PDoEUCC</b>	Provincial Directorate of Environment, Urbanization and Climate Change
<b>PIU</b>	Project Implementation Unit
<b>POM</b>	Project Operational Manual
<b>PV</b>	Photovoltaic
<b>RE</b>	Renewable Energy
<b>SEA/SH</b>	Sexual Exploitation and Abuse/Sexual Harassment
<b>SEP</b>	Stakeholder Engagement Plan
<b>UN</b>	United Nations
<b>WB</b>	World Bank

## 1. INTRODUCTION

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process being implemented within the scope of the Public and Municipal Renewable Energy (“PUMRE” or the “Project”) Project. The SEP is formed in accordance with the World Bank’s ESS10 Stakeholder Engagement and Information Disclosure and is an integral part of the Environmental and Social Management Framework (ESMF) of the Project.

This Project aims to reduce energy use in central government buildings and inform the development of sustainable financing mechanisms to support a scaled-up, national program for energy efficiency in public buildings such as universities and/or administrative ones by using renewable sources. The project will support the Government of Türkiye to scale up renewable energy use in the public sector by focusing on central government buildings. The Project will contribute to expanding the RE market in public facilities to use sustainable energy solutions to deliver on the country’s climate mitigation commitment and enhance energy security.

The project will be implemented by MoEUCC through its GDCA. Within GDCA a separate department, the Department of External Investments has been established in 2019 to work as the dedicated Project Implementation Unit (PIU) to manage the ongoing Energy Efficiency Public Buildings Project’s (EEPBP) Component 1 and Component 2, 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 EEPBP Project under terms of reference and with adequate staffing, and with qualifications and functions acceptably to the Bank. The department/PIU currently includes about 16 technical staff and 10 individual consultants hired to support in the areas of procurement, financial management, engineers (electrical, mechanical, civil) project assistance, environment and social issues and communication. A new team will be established under this existing PIU to administer all aspects of the proposed Project, while benefitting from cross-fertilization from the staff and consultants already working on the implementing of the EEPBP.

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

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for 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 management of 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 PUMRE 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 of the project activities.

## 2. PROJECT DESCRIPTION

### 2.1. PROJECT OBJECTIVE

Project Development Objective is to increase to use of renewable energy in public facilities. The proposed Public and Municipal Renewable Energy Project aims to support the government in decarbonizing the public building sector and also scaling up the development of distributed RE sources in Turkey. The Project is expected to create significant climate mitigation benefits through GHG emissions reduction. The Project activities will finance using RE in central government public buildings and municipalities to reduce dependence on fossil fuel-derived energy, thus, directly contributing to GHG emission reductions. The Project activities are aligned with Türkiye's NDCs to the Paris Climate Agreement that aims to reduce up to 21 percent of GHG emissions from business-as-usual scenarios by 2030.

**PDO level indicators:** Progress made under the proposed project will be monitored according to following key project performance indicators:

- i. Renewable Energy generation capacity (other than hydropower) constructed under the project (Megawatt, Corporate Result Indicator (CRI))
- ii. Net greenhouse gas (GHG) emission reductions (as a result of RE power generation) (Metric tons/year, CRI)

Additional intermediate indicators could include:

- (iii) average electricity generation from installed RE facilities (GWh);
- (iv) number of pilot investments to combine solar PV investments with investments in lighting upgrades and heat pumps;
- (v) lifetime energy saving from pilots with light upgrades and heat pumps (MWh);
- (vi) lifetime net GHG emissions from pilots with light upgrades and heat pumps (t of CO<sub>2</sub>); and
- (vii) MRV system has been implemented.
- (viii) Percentage of consultation meeting participants who respond 'satisfied' with the citizen engagement processes

Additional preliminary indicators on gender and citizen engagement are discussed below in the relevant sections.

- Percentage of female employees in consulting firms contracted under Component 3a who are key staff
- Participants in gender-bias training from potential project implementing companies (Number)

### 2.2. PROJECT COMPONENTS

The Project consists of three components: (i) RE investments in central government buildings; (ii) RE investments in municipal buildings; and (iii) technical assistance (TA) and implementation support. The description of each Project component is as follows.

#### **Component 1. Renewable Energy investments in central government.**

Component 1 will support introducing RE technologies in central government and central-government-affiliated buildings (e.g., public buildings under central ministries, universities, and hospitals) and will be implemented by the General Directorate of Construction Affairs (GDCA) under the Ministry of Environment, Urban and Climate Change (MoEUCC). Component 1 is divided into Sub-component 1a (~US\$240 million IBRD loan) focusing on primarily PV panels of RE investments, and Sub-Component

1b (~US \$8 million IBRD loan), combining RE investments with heat pumps and efficient lighting installation for 3 or 5 pilot buildings.

### **Component 2. Renewable Energy investments in municipalities**

Component 2 will support introducing RE technologies in municipalities and will be implemented by İller Bankası A.S. (İlbank). The RE installations will be primarily used to offset the overall energy consumption from public facilities (e.g., administrative buildings, water supply, water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills.

### **Component 3. Technical Assistance and Project Implementation Support**

Component 3 will finance project management and implementation support activities, including, *inter alia*, project development costs for early subprojects, such as marketing and outreach; preparation and/or technical review of feasibility studies; day-to-day project management such as bidding document preparation, tendering process management, contract management, supervision of installation and works. This component will be carried out by both MoEUCC and İlbank.

#### **Component 3a. Technical Assistance and Project Implementation Support for MoEUCC**

This Component will finance project management and implementation support activities, including, *inter alia*, procurement, finance, engineering, architectural, Occupational Health and Safety (OHS), individual consultants and other necessary technical expertise; sub-project supervision; monitoring, evaluation and reporting of the Project; communication with Project beneficiaries; training of PIU staff, etc. It would also finance requirements related to the Bank's fiduciary policies and guidelines, Project audits, gender and citizen engagement, social surveys as well as the implementation of environmental and social framework requirements.

#### **Component 4a. Contingent Emergency Response Component (CERC).**

This component is included in accordance with OP/BP 10.00 (Investment Project Financing), paragraphs 12 and 13, for contingent emergency response through the provision of immediate response to an Eligible Crisis or Emergency, as needed. It will allow the Government of Türkiye to respond promptly and effectively to an eligible emergency or crisis, that is a natural or human-made disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact by requesting a rapid reallocation of project funds. The Project Operations Manual will specify the procedures for activating the CERC.

## **2.3. PROJECT LOCATION**

An initial pipeline of about 80 subprojects in central government facilities has already been identified, amounting to a total generation capacity of nearly 60 MW. This pipeline includes ground mounted , car park, and rooftop solar PV installations. GDCA is in the process of evaluating additional candidate subprojects against key eligibility criteria for inclusion in the pipeline.

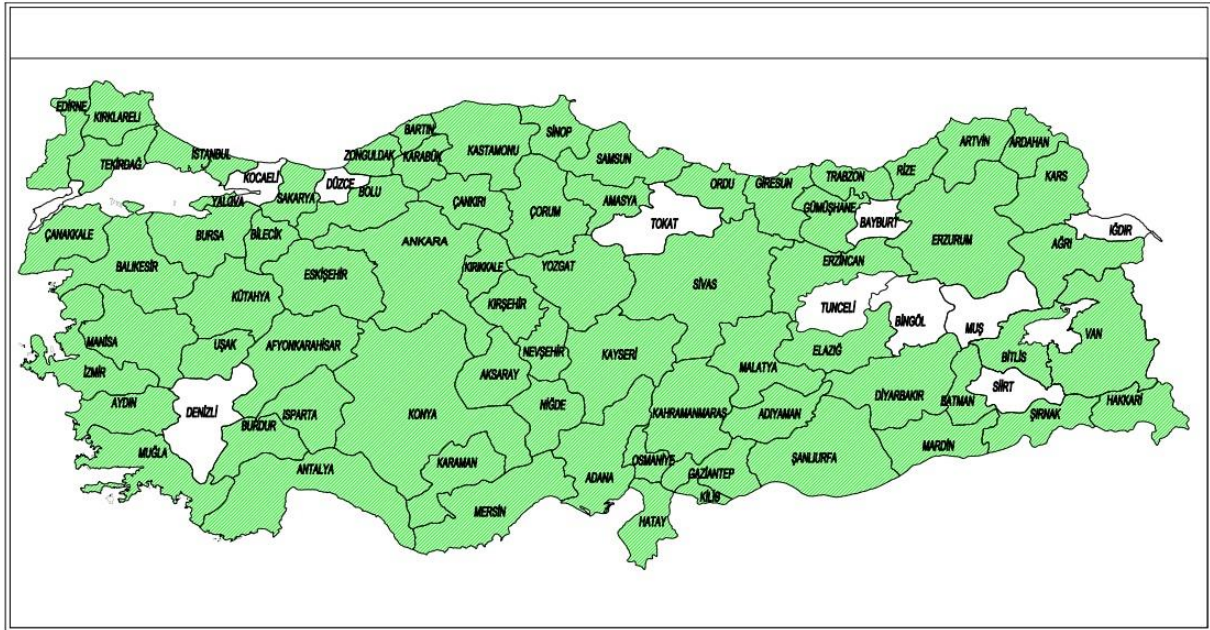


Figure 1: Cities for possible sub-project pipeline

### 3. REGULATORY CONTEXT

#### 3.1. NATIONAL LEGISLATION FOR STAKEHOLDER ENGAGEMENT

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

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

#### Constitution of Republic of Turkey

Constitution of Republic of Turkey is the fundamental document in respect to guaranteeing citizens' freedom of thought and opinion (Article 25 of the Turkish Constitution). No one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions. Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities (Article 26 of the Turkish Constitution). In addition, Turkish citizens and foreigners residing in Turkey, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Turkey with regard to the requests and complaints concerning themselves or the public (Article 74).

The Communication Center of the Presidency (CİMER) is a public relations tool that enables fast and effective communication between citizens and public institutions and agencies for application of any information request and submission of suggestions and complaints. The communication channels of CİMER are as follows:

- Online application through the web site; <https://www.cimer.gov.tr/> and in E-Government website; <https://giris.turkiye.gov.tr/>
- Hotline: 150
- Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara



- Phone: +90 312 525 55 55
- Fax: +90 312 525 58 31

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**

Law on the Right to Information No.4982 (Official Gazette dated 24.10.2003 and numbered 25269) defines the process concerning the right to information. It regulates this right in line with the principles of equality, impartiality, and transparency, which are the prerequisites of democratic and transparent administration.

The institutions are required to apply administrative and technical measures to provide every kind of information and document, with the exceptions set out in this law, to provide the information for applicants; and to review and decide on the applications for access information promptly, effectively and correctly. (Law on the Right to Information Article 5)

### **The Law on Use of the Right to Petition**

Citizens of the Turkish Republic are entitled to apply Turkish Grand National Assembly and the public authorities by written petition, in respect to their requests and complaints, in accordance with the Article 3 of the Law on Use of the Right to Petition (Official Gazette dated 01.11.1984 and numbered 3071). On the condition of reciprocity and using Turkish language in their petitions, foreigners residing in Turkey are entitled to enjoy this right.

### **Regulation on Environmental Impact Assessment**

**According to the EIA regulation published in 2022;** Renewable energy projects especially in solar power plants with a project area of 20 hectares or more or an installed power of 10 MWm or more will be implemented with Environmental Impact Assessment. These projects are included in the Annex-1 of the EIA Regulation. Solar power plants with a project area of 2 hectares or more or an installed power of 1 MWm or more (excluding roof and facade systems) are included in Annex-2 (Projects subject to previous and assessment for environmental impacts) of the Regulation. As stipulated by the new regulation, a SEP is prepared annexed to EIA Application File for Annex I activities. SEP describes the methods, tools and means to communicate and share information with the stakeholders (relevant to, affected from, affecting the project) about the project activities throughout all project stages.

For sub-projects over 10 mW, Article 9 of the EIA Regulation (Public Information and Participation Meeting) will be applied. Accordingly: stakeholder meetings can be held at the date and time set by MoEUCC in a place easily accessible to the public. These meetings are held by the director of the PDoEUCC. If the director is unable to attend, an official appointed by him/her manages the meetings. Within the scope of the PUMRE Project, the Feasibility Consultant will prepare the stakeholder engagement plans for each building type and organize these meetings, if necessary. In these meetings, the stakeholders will be informed about the project; opinions of stakeholders will be taken and questions will be answered.

Three stakeholder engagement meetings are planned for the beneficiaries in PUMREP. The first meetings will be done before the sub-project activities begin and it will be carried out in all sub projects. The second meeting will be carried out during the installation works and the third meeting after the sub-projects are completed. The second and third meetings will be held in 20% of the buildings. Balanced representation of all types of buildings will be ensured at these meetings.

## **3.2. 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 the 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 World Bank developed an Environmental and Social Framework (ESF) setting out the World Bank’s commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards (ESSs) that are designed to support Clients’ projects, with the aim of ending extreme poverty and promoting shared prosperity. The ESSs set out the mandatory requirements that apply to the Client and projects. They present set of obligatory guidelines and instructions with the main objective to foster efficient and effective identification and mitigation of potentially adverse environmental and social impacts that may occur in the development projects, with proper stakeholder engagement and sustainable management.

WB has set out a comprehensive set of specific ESSs that projects are expected to meet. Stakeholder engagement in line with the World Bank requirements is associated with ESS 10 which recognizes “the importance of open and transparent engagement between the Client and project stakeholders as an essential element of good international practice”. Specifically, the requirements set out by ESS10 are the following:

- “Clients 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.
- Clients will engage in meaningful consultations with all stakeholders. Clients 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.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Client 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 needs 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 Client will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Client will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances. The grievance mechanism (GM) is an accessible and inclusive system, process, or procedure that receives and acts on complaints and suggestions in a timely fashion and that facilitates resolution of concerns arising from a project. An effective grievance mechanism provides project-affected parties with redress and tackles issues at an early stage (World Bank 2018b: 12)

#### **4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES**

GDCA/PIU will organize meetings with all identified/potential stakeholders of the project including the building users (building managers, staff, health personnel, academic personnel, students, etc.) to explain the implementation of the project. The stakeholders will be informed about the potential risks/impacts of the Project and their feedbacks/concerns will be received and considered during the project implementation. Three stakeholder engagement meetings are planned to be conducted for each sub-project the beneficiaries. The first meetings will be done before the sub-project activities begin and it will be carried out in all sub projects. The second meeting will be carried out during the installation works and the third meeting after the sub-projects are completed. The second and third meetings will be held in 20% of the buildings to represent a sample of all buildings which would give a representative feedback on the stakeholders' perceptions regarding the works conducted. Balanced representation of all types of buildings will be ensured at these meetings. In this way the whole process will be evaluated.

The sub-project specific consultations will immediately start to consult relevant parties during project design and implementation and establish a project-level grievance system for the facility by considering Covid-19 precautions.

#### **5. STAKEHOLDER IDENTIFICATION (MAPPING)**

Project stakeholders are defined as individuals, groups or other entities who:

- are impacted or likely to be impacted directly or indirectly, positively or adversely, by the Project (also known as 'affected parties'); and
- may have an interest in the Project ('interested parties'). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the Project outcomes in any way.

In order 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 in an open manner, 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, elderly and the cultural sensitivities of diverse ethnic groups.

When deciding the frequency and the appropriate engagement technique used to consult a particular stakeholder group, three criteria must be considered:

- The extent of 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 *impact* 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.

For the purposes of effective and tailored engagement, stakeholders of the proposed project can be divided into the following core categories:

- **Affected Parties** – persons, groups and other 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;
- **Other Interested Parties** – 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; and
- **Disadvantaged / Vulnerable Individuals or Groups**– 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 determination of relevant stakeholders is of crucial importance to ensure meaningful consultation on the Project. The identified stakeholders at this stage are presented in the following sub-headings. Stakeholders that were not identified during this process should contact the MoEUCC to request their addition to the list.

The Table 1 below summarizes the potential interests and influence for each of the above-mentioned affected parties.

**Table 1** Potential interests and influence for each of affected parties

Stakeholder Group	Impact	Influence
<ul style="list-style-type: none"> <li>• Students, patients, visitors, and their families</li> <li>• Teachers, healthcare professionals and other employees working at the facilities/buildings</li> <li>• Private parking lot operators within the university</li> <li>• Public Buildings administrators and staffs</li> </ul>	Medium	Medium

<ul style="list-style-type: none"> <li>Residents of municipalities, villages and communities which could potentially be affected by the construction/installation activities at the buildings</li> <li>Landowners and land users adjacent to the buildings</li> </ul>		
<ul style="list-style-type: none"> <li>World Bank</li> </ul>	Medium	High
<ul style="list-style-type: none"> <li>MoEUCC</li> <li>MoH</li> <li>MoENR</li> <li>MoAF</li> <li>MoYS</li> <li>MoT</li> </ul>	High	High
<ul style="list-style-type: none"> <li>Construction companies and their employees</li> <li>Equipment suppliers and supply workers</li> <li>Consultants, supervisors</li> </ul>	High	Medium
<ul style="list-style-type: none"> <li>Local authorities (Local governors and municipalities)</li> <li>NGOs – Associations on local and national level (Turkish Women in Renewables and Energy, Green Collar Women's Association etc)</li> <li>Media (social media, tv channels, printed media etc.)</li> <li>General public</li> </ul>	Low	Medium

### 5.1. AFFECTED PARTIES

Within the scope of this project, PV panels will be installed on the ground, on the rooftops and on the car parks. It is foreseen that the building users and beneficiaries (Students, patients, visitors, and their families, teachers, healthcare professionals and other employees working at the facilities/buildings) will be affected by the installation processes to be carried out on the buildings. But no significant impact is expected that will directly affect their daily lives in a negative way. These groups may experience temporary impacts related to the installation activities such as community health and safety, transportation of materials, disruption of access etc.

The car parks won't be available for use during the installation process. Therefore this situation may affect the users of parking area. At the same time, car parks in places such as university hospitals may be operated by private businesses. These businesses may also suffer a loss of revenue for a temporary short period of time.

### 5.2. OTHER INTERESTED PARTIES

The project stakeholders other than the directly affected communities provided below Table 2.

**Table 2** Other interested parties

Other interested parties	Interest in the project
<ul style="list-style-type: none"> <li>Local governors (governorship, municipality etc.)</li> </ul>	Potential concerns over regarding environmental and social impacts: Raising awareness about solar system
<ul style="list-style-type: none"> <li>NGOs – Associations on local and national level (Turkish Women in Renewables and Energy, Green Collar Women's Association etc)</li> <li>Media (social media, tv channels, printed media etc.)</li> <li>General public</li> </ul>	Potential concerns over regarding environmental and social impacts: Raising awareness about solar system

### 5.3. DISADVANTAGED / VULNERABLE INDIVIDUALS OR GROUPS

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project. It is similarly important to ensure that project-related awareness raising and stakeholder engagement be adapted to take into account particular constraints, concerns and cultural sensitivities of such groups and individuals and to ensure their full understanding of project activities and benefits. The vulnerability may stem from person's origin, gender, age, health condition, current economic constraints and financial insecurity, disadvantaged status in the community (e.g. refugees, minorities or marginal groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project so that their awareness of and input to the overall process are commensurate to those of the other stakeholders. The identified vulnerable groups and the way of communication is detailed in the Table 3.

**Table 3** Identified vulnerable groups and the way of communication.

<b>Vulnerable Groups and Individuals</b>	<b>Characteristics/ Needs</b>	<b>Preferred means of notification/consultation</b>	<b>Additional Resources Required</b>
People with physical disabilities (mobility, hearing, vision impairment, etc.)	Accessibility, lack of information and funding for training in special needs	Special training needs such as audio devices, accessible venues, etc.	Special training facilitators, sign language translators/ interpreters
Women	Accessibility, lack of information	Communication in accessible venues, methods	
Elderly people	Accessibility, lack of information and lower familiarity with online tools, services, and communication channels	Communication in accessible venues, methods	
Refugees	Accessibility, lack of information and lower familiarity with online tools, services, and communication channels	Support of alternative language	Translator

### 6. STAKEHOLDER ENGAGEMENT PLAN

Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive

relationships that are important for 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 PUMRE Project recognizes the rights of the local communities and as key stakeholders in the project. Stakeholder engagement will be free of manipulation, interference, and intimidation, and conducted on the basis of 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 PUMRE Project stakeholders will be engaged as early as possible and will continue the engagement throughout the planning, 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 of the PUMRE 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.

Sub-project SEPs (based on the type of the sub-project) will be prepared by the Feasibility Consultant in line with this SEP. The feasibility consultant will prepare three types of SEP, one for the universities/dormitories, one for the health/medicine faculties/hospitals and the other one for the public buildings.

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.

The PUMRE Project recognizes that being open, listening to the community, and ensuring that the community understands proposed construction methods and timelines is the best approach to building effective relationships with the community to assist minimize project impacts.

List of stakeholders during the project implementation will be continuously updated and they will be incorporated in the SEP document. MoEUCC will discuss different issues with each group of stakeholders depending on their role, responsibility and importance as stakeholder. The following table contains the main issues that will be discussed with different stakeholders.

A variety of communication methods will be used as appropriate for each set of stakeholders. In general, these include a) Public and individual consultation meetings, b) Announcements in media, c) Provision of general information on noticeboards at public locations, d) Regular mail and email correspondence and Publication of relevant project information on the website of the GDCA.

**Table 4** Stakeholder Engagement Techniques for each stakeholder group

Stakeholder group	Engagement Technique	Project phase	Responsible
<ul style="list-style-type: none"> <li>• Students, patients, visitors, and their families</li> <li>• Academic staff, healthcare professionals and other workers at the buildings, visitors.</li> <li>• Residents of communities which could potentially be affected by the installation activities at the buildings</li> <li>• Landowners and land users adjacent to the buildings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the branch sub-project buildings/facilities at least two weeks prior to the start of any construction works,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before commencement of the sub-project activities</li> </ul>	<ul style="list-style-type: none"> <li>▪ DSI Consultant</li> <li>▪ Supervision Consultant</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Public consultation meeting, and individual meetings as necessary,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before commencement of the sub-project activities</li> <li>▪ During the construction/installation works</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU</li> <li>▪ Feasibility Consultant</li> <li>▪ Supervision Consultant</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Informing through the media – radio/TV/social media (announcements),</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before commencement of the project activities</li> <li>▪ During the construction/installation works</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Direct information through the local authorities</li> <li>▪ Communication through bulletin boards (placed in appropriate places) and posting project information/notices there</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before commencement of the project activities</li> <li>▪ During the installation works</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU</li> <li>▪ Feasibility Consultant</li> <li>▪ DSI Consultant</li> <li>▪ Supervision Consultant</li> <li>▪ PDoEUCC</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Group meetings with residents/employees or other groups using the buildings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before starting with implementation of the project activities</li> <li>▪ During the installation works</li> </ul>	<ul style="list-style-type: none"> <li>▪ Feasibility Consultant</li> <li>▪ Supervision Consultant</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Direct communication with residents, companies, employees or other groups using the buildings etc.,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before starting with implementation of the project activities</li> <li>▪ During the construction works</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU</li> <li>▪ Feasibility Consultant</li> <li>▪ Supervision Consultant</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Direct information via a contact person or person responsible for the implementation of the SEP.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before starting with implementation of the project activities</li> <li>▪ During the installation works</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU</li> <li>▪ Feasibility Consultant</li> <li>▪ Supervision Consultant</li> <li>▪ PDoEUCC</li> </ul>
<ul style="list-style-type: none"> <li>• MoEUCC</li> <li>• MoERG</li> <li>• MoYS</li> <li>• MoT</li> </ul>	<ul style="list-style-type: none"> <li>▪ Official correspondence</li> </ul>	<ul style="list-style-type: none"> <li>▪ Before starting with implementation of the project activities</li> <li>▪ During the installation works</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU</li> <li>▪ Feasibility Consultant</li> <li>▪ Supervision Consultant</li> </ul>



Stakeholder group	Engagement Technique	Project phase	Responsible
• PDoEUC C			▪ PDoEUC
	▪ Meetings, public hearings	▪ Before starting with implementation of the project activities ▪ During the installation works	▪ PIU ▪ Feasibility Consultant
	▪ Individual meetings.	▪ Before starting with implementation of the project activities ▪ During the installation works	▪ PIU ▪ Feasibility Consultant ▪ Supervision Consultant ▪ PDoEUC
• Interested non-governmental organisations (NGOs)	▪ Public consultation meetings, and individual consultation meetings as necessary	▪ Before starting with implementation of the project activities ▪ During the installation works	▪ PIU ▪ Feasibility Consultant ▪ Supervision Consultant ▪ PDoEUC
	▪ Direct email communication		▪ PIU ▪ Feasibility Consultant ▪ Supervision Consultant
	▪ Media/ press releases.		▪ PIU
• DSI Consultants, Supervision Consultants, Feasibility Study Consultant, and their employees	▪ Information through tender procedure and Contracts	▪ Before starting with implementation of the project activities	▪ PIU ▪ Feasibility Consultant ▪ Supervision Consultant ▪ DSI Consultant
	▪ Individual meetings via supervising engineers	▪ During the installation works	▪ PIU ▪ Feasibility Consultant, ▪ DSI Consultant ▪ Supervision Consultant
	▪ Toolbox talks at construction sites on health and safety topics	▪ During the installation works	▪ DSI Consultant ▪ Supervision Consultant
	▪ Trainings.	▪ During the installation works	▪ PIU ▪ DSI Consultant ▪ Supervision Consultant

During the whole life of the project, gender, ethnic and cultural diversity of the citizens should be taken into consideration, especially for their engagement on the project and organizing meetings and public hearing events.

Prior to any engagement event the following actions will occur:

- Selection of individual stakeholders with whom engagement will occur;

- Selection of methods for disclosure of information (including such topics as format, language, and timing);
- Selection of location and timing for engagement event (avoiding busy work times, which may be seasonal, and days/times when special events may be occurring due to ethnic and cultural issues);
- Agreeing mechanisms for ensuring stakeholder attendance at engagement event;
- Identification and implementation of feedback mechanisms to be employed.

## **6.1. PROPOSED STRATEGY FOR INFORMATION DISCLOSURE AND CONSULTATION**

The PIU intends to provide all relevant information for the PUMREP to the public by social media,). All interested and affected parties will be able to find the following documents on the PUMRE Project official website:

- Environmental and Social Management Framework (ESMF) for PUMREP,
- Stakeholder Engagement Plan (SEP) for PUMREP including grievance mechanism,
- Labor Management Procedure,
- Environmental and Social Commitment Plan (ESCP),
- Project Operational Manual.

These documents will remain in the public domain for the duration of the Project. The SEP will be periodically updated.

All information regarding the PUMRE project shall be available on the MoEUCC's and WB's website and also MoEUCC's social media accounts that will serve as a media tool/channel for communications with the residents. All stakeholders, including the public, will be able to use the Grievance Mechanism (GM). 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. (Detailed information about GM is given in Section 7)

Information prior and during project implementation will be also made available through brochures or leaflets to be distributed in regions where activities will be conducted.

The MoEUCC/PIU will be responsible for the disclosure of SEP and GM before the commencement of the project, so that the community is made aware of channels to bring out their complaints.

The MoEUCC/PIU will disclose all ESMPs for 14 days for each sub-project to provide sufficient information to all stakeholders about how the sub-project will be carried out and how grievances/concerns/suggestions can be submitted by the stakeholders. In addition, the MoEUCC will prepare Project communication materials such as brochures, posters for informative purposes specific to sub-projects and these materials will be delivered to the relevant stakeholders.

Sub-project/building specific disclosure/informative meetings will be held by the Feasibility Consultants in collaboration with the Supervision Consultants and PIU. PIU will attend all meetings and the social specialist of PIU will be in touch with the contact person in each building

The announcement for the organization of consultation meeting events for draft versions of all framework documents will be communicated via e-mails, website and social media and will be published in newspapers.

The PIU from MoEUCC will collect relevant feedback, comments and information through GM and continuous consultation held with stakeholders as and take corrective action as needed.

PIU will conduct several consultation methods (current condition of Covid-19 pandemic will be considered when selecting the consultation method) to communicate information regarding the Project and collect suggestion, observation, options, grievances of stakeholders about the sub-projects. Following consultation methods may be applied by PIU:

- face-to-face meetings such as town halls or workshops,
- focus groups,
- written consultations,
- online consultations
- grievance mechanism

## **6.2. PROPOSED STRATEGY TO INCORPORATE THE VIEW OF VULNERABLE GROUPS**

Disadvantaged or vulnerable individuals and groups in the context of this Project will be women, elderly, refugees, and disabled, who experience higher unemployment or informal employment characterized by less pay, and generally under disadvantageous conditions and have less means and opportunity to express their concerns, or access information to understand their rights or the impact of the project.

In order to incorporate the view of vulnerable groups;

- Engagement with local organizations and NGOs representing the interests of persons with disabilities will be carried out,
- Separate consultations in places of easy access will be conducted for women, youth and disabled persons and any other vulnerable groups in the targeted provinces,
- Information on the project will be provided in individual meetings, in different languages (Arabic, Kurdish etc.) and or in braille if required,
- Consultations will be conducted at the locations which enable the access of vulnerable groups,
- Any written or printed project related material to disseminate information will be prepared in culturally proper, easy to understand language and translated before dissemination on sites also known to and accessible by the project's vulnerable groups.

## **6.3. REVIEW OF FEEDBACKS FROM STAKEHOLDERS**

Ongoing feedbacks and comments received from the stakeholders throughout the project implementation will be reviewed and necessary corrective actions, if needed, will be undertaken by the Social Consultant/Expert and project assistant of PIU with relevant stakeholders to ensure smooth implementation of the project.

Additionally, 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**

A new team under the current PIU in the GDCA will be responsible for overall PUMRE Project implementation, including the implementation of this SEP. The department has qualified technical staff who have experience in managing design, construction, and retrofitting contracts and will be strengthened more with hiring additional staff to provide efficient support to the PUMRE project.

The PIU's Individual Social Expert Consultant and Feasibility Consultants will be responsible for the implementation of the SEP during the entire Project cycle and in charge of communicating with the communities.

Sub-project SEPs will be prepared by the feasibility study consultants in line with the SEP. All DSI Consultants in charge of carrying out specific sub- project activities will also be required to implement the relevant provisions of SEP. The grievance mechanism requirements will be laid out in the tender documentation and contracts signed with the Supervision Consultants.

PIU will review SEPs and share them with the Bank for clearance, if necessary. Provincial level stakeholder engagement activities will be managed by the Feasibility Consultant and PIU. (provincial level consultation meetings should be held with participation of building management representatives, any NGO foundation for disabled people, relevant provincial representatives of the ministries, etc.). Sub-

Project/building-level stakeholder engagement activities will be executed by the Feasibility Consultants in collaboration with the Supervision Consultants. All DSI Consultants in charge of carrying out specific project activities will also be required to implement the relevant provisions of SEP.

## **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, Grievance Mechanisms (GM) will be established for the Project and sub-projects and 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 an important feedback and learning mechanism that can help improve project impact.

The mechanism focuses not only on receiving and recording complaints but also on resolving them. 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 PUMRE Project, grievances/concerns/suggestions will be handled at multiple levels: (a) DSI Consultants level; (b) Supervision Consultant level; (c) MoEUCC Provincial Directorates level; (d) national level MoEUCC Project Implementation Unit (PIU).

- a) **DSI Consultant:** The DSI consultants will be responsible for supplying grievance boxes, installing them in each building, designing and printing posters and brochures about the grievance mechanism and the project, registering grievances/concerns/suggestions by filling out the Complaint and Suggestion Form (provided in Annex 1 and 2 respectively), taking necessary actions to address the grievances/concerns/suggestions, sending the records to the Supervision Consultant and PIU on weekly basis. The DSI Consultant is also responsible to setting up a Grievance Mechanism (GM) for the project workers which will be detailed in further section.
- b) **Supervision Consultant:** Each Supervision Consultant will be responsible for receiving, recording and if possible, resolving the grievances/concerns/suggestions that are raised by any stakeholder (public building management, building users, visitors, host communities, or beneficiaries, etc.) due to the installation works within the scope of the PUMRE Project. If the social specialist of the Supervision Consultant is not able to resolve the grievances/concerns/suggestions, they are obliged to direct them to the project manager. If the Project Manager is not able to resolve the requests/suggestions/grievances, he/she is obliged to direct them to the PIU. The Supervision Consultant is obliged to send the record of the grievance/concern/suggestions to the MoEUCC PIU on 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 grievance/concern/suggestions regarding the activities carried out within the scope of the PUMRE Project to the extent possible. The PDoEUCC is obliged to send the record of the grievance/concern/suggestions to the MoEUCC on monthly basis. The MoEUCC Provincial Directorates responsible for supervision works will also be responsible for the implementation of the GRM Procedure.
- d) **MoEUCC Level:** Within the scope of PUMRE Project, MoEUCC is responsible to collect, record, and resolve all grievance/concern/suggestion raised by stakeholders through the above-mentioned levels. There will be a central grievance record to be kept by the social specialist of PIU. MoEUCC is responsible for resolving the collected grievance/concern/ suggestion within 30

days and informing the owner of the grievance/concern/ suggestion about the result. The MoEUCC currently has a call center (Alo181) that can be accessed via both phone and website. This call center is used for all site-related issues for the projects that are being implemented by the MoEUCC. Call center officers will be informed about the PUMRE project. All complaints/opinions/suggestions coming to ALO181 will be directed to PIU by the call center officers.

The MoEUCC/GDCA will operate a website for PUMRE Project where all relevant information is being disclosed for public opinion and review. Through the complaint submissions section and e-mail address ([yigmenerji@csb.gov.tr](mailto:yigmenerji@csb.gov.tr)) that will be available in 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 enabled. The details of the communication channels are given below:

**E-mail:** [yigmenerji@csb.gov.tr](mailto:yigmenerji@csb.gov.tr)

**Webpage**<sup>1</sup> [www.kamuenerji.csb.gov.tr](http://www.kamuenerji.csb.gov.tr)

**MoEUCC Call Center** Alo 181

- 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.
- Online application in web site; <https://www.cimer.gov.tr/>
- E-government website <https://giris.turkiye.gov.tr/>
- Hotline: 181
- Mail Address: T.C. Cumhurbaşkanlığı Külliyesi 06560 Beştepe – Ankara
- Phone: +90 312 525 55 55
- Fax: +90 312 525 58 31

Grievance/concern/suggestion collected through different channels will be recorded by the MoEUCC and responded within 30 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 DSI Consultants verbally or in writing (by post or e-mail) or by filling in a grievance form. The grievance form will be made available on the construction sites that are easily accessible for 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 DSI Consultant, Supervision Consultant, PDoEUCC and MoEUCC PIU:

- Written acknowledgement 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

---

<sup>1</sup> Project specific complaint form will be published online, and relevant link will be provided in final version of this SEP.

- Available printed copies in 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.

All complaints will be verified by the Supervision Consultant in the Grievance Log and assigned a number and acknowledged within 30 calendar days. The grievance log will have all 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 grievance and when acknowledgement 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, in order 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 follow-up of corrective action within 30 calendar days upon the acknowledgement of grievance. In 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 in accordance with the legal framework of the Republic of Turkey, including formal judicial appeal.

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 work place behavior.

In addition, individuals or communities who believe that they are adversely affected by the projects supported by WB can send their complaints to the World Bank's Grievance Resolution Service (GRS) (<https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>) GRS ensures that the received grievances are quickly examined in order to eliminate the 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.

### **8.1. Workers' GM**

The MoEUCC PIU, Supervision Consultant, and DSI Consultant will develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of works. 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 Feasibility Study Consultant will apply to PIU for their grievances through the project web site.

The Supervision Consultant, DSI Consultant and PDoEUCC will record, 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. MoEUCC will also record and resolve the grievances of its employees and compile all data gathered from different levels (Supervision Consultant, PDoEUCC and DSI Consultant) 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” 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
- Management will treat grievances seriously and take timely and appropriate action in response

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”, call center, announcements during training, seminars, meetings, access link on 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 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 with Sexual Exploitation, Abuse/Sexual Harassment and lack of Covid-19 measures with special measures in place.

## **8.2. GRIEVANCE LOG**

The Supervision Consultant team and PDoEUCC 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 of resolving the appeal,
- Agreed action plan.

The PIU’s Social Expert and focal points 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:

- Name of the PAP, 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.

### 8.3. MONITORING AND REPORTING ON GRIEVANCES

Monitoring and evaluation of the stakeholder process is important to ensure PIU is able to 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 months periods. Supervision Consultant and PDoEUCC will be responsible for:

- Collecting data from the DSI Consultants 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 biannually 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 number of received grievances (applications, suggestions, complaints, requests, positive feedback), highlighting those grievances related to the WB ESS 2 and 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 taken.

Feasibility Study Consultant's team, if engaged, would be responsible for:

- Establishes good relationship with all identified stakeholders,
- Organize the stakeholder engagement meeting events for sub – projects,
- Notice the stakeholder's comments on sub-projects and records their appeals,
- Prepare Semi-Annual Reports and submit to the Project Director.

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 monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment, and updating of this SEP, and reporting to the stakeholders.



## 9. Disclosure of ESF Documents and Consultation Meeting

All E&S documents prepared for the project (ESMF, ESCP, SEP and LMP) were disclosed on the PUMREP's official webpage ([www.kamuenerji.csb.gov.tr](http://www.kamuenerji.csb.gov.tr)) on March 17, 2023 both in Turkish and English before the virtual consultation meeting for the review of the stakeholders. On March 17, 2023, an official letter was sent for the virtual consultation meeting to be held on March 28, 2023 with the participation of line ministries, beneficiaries, representatives of government institutions and universities. More than 300 participants attended the meeting and the photographs taken from the meeting are given in Annex-5. The comments and suggestions raised during the consultation meeting are considered during finalization of the ESF documents.

The meeting was led by the Deputy General Director of GDCA, Mrs. Elif UZ and Head of External Investments Department, Mrs. Esra TURAN TOMBAK. Firstly, Mrs. TOMBAK, made a presentation and provided detailed information about the project including (i) financial details (creditor, warrantor, etc.), (ii) objectives, targets and components of the Project, (iii) eligibility criteria of the project, (iv) outputs of the project. Afterwards, environmental and social management of the Project focusing on (i) the objective of preparation of ESF documents, (ii) benefits and potential adverse environmental and social impacts of the Project, (iii) responsibilities of Consultants while handling the project's environmental and social aspects, (v) monitoring and reporting requirements for the grievance mechanism have been presented by individual consultants Environmental (Ganime GÜZEL), Social (Semahat Dicle MAYBEK) and OHS expert (Tülün YILDIRIM). The presentation has been disclosed on the Projects' web page on March 27, 2023.

During the Questions and Answers (Q&A) sessions of the meeting, the participants raised their questions. Some of the questions and the answers/explanations provided to the participants are presented below.

**Table 5: Summary of the Questions and Answers Session**

QUESTIONS	ANSWERS
How will the application process work?	The SPP Information Form published on the website of the Project should be filled in and sent to <a href="mailto:batuhan.aksoy@csb.gov.tr">batuhan.aksoy@csb.gov.tr</a> via e-mail.
What is the application deadline?	There is no clear date yet. It will be announced to the stakeholders once the date is confirmed.
Will the project have any cost to our organization or is it necessary to allocate funds?	No, this project will be carried out by the General Directorate of Construction Works of MoEUCC with World Bank financing. There is no need for any appropriation transfer by your institution.
What will be the responsibility as institutions from the projecting, construction and acceptance stages?	Institutions have no responsibilities at this stage, all responsibility belongs to the MoEUCC and only the facility management will be transferred to our institution.
When is the feasibility start date?	We are planning to start feasibility studies in July 2023.
When is the installation start date?	The project is planned to start in the first quarter

	of 2024.
Is it possible to participate in the project for a region and a group of buildings that are in this state with almost all of our buildings having a historical registered character?	Such institutions and buildings are not included in the project criteria due to the phrase "Buildings registered as immovable cultural and natural property to be protected are not covered".
Can institutions that have benefited from MoEUCC projects before also benefit from this project?	Institutions that have benefited from the KABEV and KADEV projects carried out by MoEUCC will not be able to benefit from this project.
Our buildings consist of two parts. Do we have to apply for these parts separately?	No, you can fill out a single general SPP Information Form for all your buildings.
What is the eligibility criteria for Roof SPP projects?	Institutions requesting a roof project must comply with the 2019 Turkish Earthquake Code, have an energy identity document obtained in the last 10 years, and an energy identity certificate level must be at least "C" level.
Is there a power plant power limit per institution?	Our setup will be determined not to exceed the "Self-consumption" model.
Should steel construction be ready in the parking lot application or will the steel construction part be made within the scope of the project?	All productions within the scope of the project will be realized by making a tender by MoEUCC.
Will LED conversions be provided by the MoEUCC? Or are transformations also included in the project?	Heat pump and LED conversions will be carried out in pilot applications within the scope of the project.
Will there be a storage system? And will there be energy sales that can be sold to the distribution company?	There will be no storage system. Monthly set-off will be made with distribution companies for self-consumption.

The site-specific ESMPs, SEPs and OHSPs will also be publicly disclosed, and beneficiary, local communities, and NGOs will be consulted on the environmental and social implications of the individual project activities prior to tendering of works.

The ESF documents to be prepared specific for the Project or the sub-projects are living documents which can be updated in accordance with any change on the project and its sub-projects. The feedback submission system will be accessible for all stakeholders throughout project implementation through submission of official correspondences, online feedback forms, e-mails.

**Annex- 1 GRIEVANCE FORM**

<b>Reference No</b>	
<b>Full Name (not mandatory, you can submit anonymously)</b>	
Please mark how you wish to be contacted (mail, telephone, e-mail).	
<b>Province/District/ Location</b>	
<b>Date</b>	
<b>Category of the Grievance</b>	
1. On abandonment (public)	
2. On assets/properties impacted by the project	
3. On infrastructure	
4. On decrease or complete loss of sources of income	
5. On environmental issues (ex. pollution)	
6. On employment	
7. On traffic, transportation and other risks	
9-Other (Please specify):	
<b>Description of the Grievance</b> What did happen? When did it happen? Where did it happen? What is the result of the problem?	
<b>What would you like to see happen to resolve the problem?</b>	
<i>Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information.</i>	

**Signature:**

**Date:**

**Annex- 2 GRIEVANCE CLOSEOUT FORM**

Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <span style="margin-left: 200px;"><input type="checkbox"/> NO</span>
<b>CONTROL OF THE REMEDIATE ACTION AND THE DECISION</b>	
Stages of the Remediate Action	Deadline and Responsible 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. Grievance Log

Grievance and Suggestion Register Number	Details on Grievance/Suggestion In-Take Channel				About the Complainant				About the Complaint/Suggestion				Action Taken				Supporting Documents for Grievance/Suggestion Close-Out	Please provide details If the Complaint could not be Closed/Resolved  (referral was made to another institution/person 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, provincial 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 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 it 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 course of 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
- Reduces the need to resort to judicial proceedings.

The operational flow of Grievance Mechanism for the stakeholders is given in Figure 1.



**Figure 1. 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 their any type of requests (complaints, compliments, feedback, inquires for information, etc.) related to the overall management and implementation of the project, as well as issues pertaining to 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)]<sup>2</sup> in workplace),
- 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.

General feedback, questions, suggestions, compliments: The Project Implementation Unit (PIU) of the Ministry of Environment, Urbanization and Climate Change (MoEUCC) established a transparent and comprehensive project level GM with the aim of resolving and administering the requests that could be encountered during renovation of public buildings as well as to address other social issues pertaining to transfer of staff and relocation once the public buildings are operational, if needed.

The individuals and communities directly or indirectly affected or likely to be affected by the Project may have concerns regarding the actual benefits or the temporary impacts of renovation. In this respect, the mechanism will allow overall public communities to express their concerns and requests. The GM will establish clearly defined timelines for acknowledgement, update and final feedback to the complainant. These timelines will be disseminated widely to Project stakeholders.

### Scope

The GM will be accessible to a broad range of Project stakeholders who are likely to be affected directly or indirectly by the project. These will include beneficiaries, employees (including PIU members), administrations, users of the buildings that are strengthened and wider public, project implementers/Design, Supply, Installation (DSI) Consultants/service providers etc.—all of whom will be encouraged to refer their grievances and feedback to the GM. In addition, care will be taken to ensure that the grievance mechanism to be established 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.

The below Table 4 presents the responsible parties and their roles/responsibilities for the GM implementation.

**Table 4. Responsible Parties in Grievance Mechanism Implementation at Each Defined Level**

Responsible Party	Responsibilities
<b>Ministry of Environment, Urbanization and Climate Change/Project</b>	<ul style="list-style-type: none"> <li>• The PIU will be responsible for the overall implementation, management, and coordination of this Standard Operating Procedure (SOP).</li> <li>• PIU will also guide and assist the relevant responsible parties to ensure successful implementation of this SOP.</li> <li>• PIU will be responsible for continuous monitoring of each process of the</li> </ul>

<sup>2</sup> 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.

<b>Implementation Unit (MoEUCC/PIU)</b>	stakeholder's requests to assure compliance with the GM Procedure.
<b>GM Contact Person of the PIU</b>	<ul style="list-style-type: none"> <li>• Acting as the GM contact person in the PIU.</li> <li>• Reviewing, and classifying whether the grievances are genuine/eligible and related to Project activities or not together with relevant member(s) of the PIU.</li> <li>• Establishing the main register and monitoring system for this SOP and following up all grievances relevant to the Project.</li> <li>• Managing and coordinating the resolution of grievances within the Project.</li> <li>• Reviewing grievance records to illustrate significant non-compliance issues or recurring problems regarding the stakeholder engagement and other Project activities and coming up with actions.</li> <li>• Coordinating and monitoring the GM contact persons at DSI Consultant level.</li> <li>• Consolidating Project related requests received from different GM levels.</li> <li>• Informing the PIU and the management about the resolution process.</li> <li>• Preparing consolidated GM reports of the Project.</li> </ul>
<b>GM Contact Person of the (Provincial Directorate of Ministry of Environment and Urbanization (PDoMoEUCC))</b>	<ul style="list-style-type: none"> <li>• Receiving the project related requests (complaints, compliments, feedback, inquires for information, etc.).</li> <li>• Evaluating and addressing the complaints whichever falling into their area of responsibility by taking confidentiality and security measures.</li> <li>• Recording each request whether they are addressed or not on the register and monitoring system and convey the register log to the MoEUCC on monthly basis.</li> <li>• Immediately notifying the MoEUCC/PIU if complaints have great significance (sexual abuse, workplace accident, etc.).</li> </ul>
<b>Social Specialists of the DSI Consultant</b>	<ul style="list-style-type: none"> <li>• Receiving, recording and if possible, resolving the concerns and grievances.</li> <li>• Recording the requests through the: Grievance/Suggestion Form (Annex 1) and the Grievance Closeout Form (Annex 2).</li> <li>• Recording verbal concerns and grievances to Complaint and Suggestion Form.</li> <li>• Submitting the record of the concerns and grievances to the Project Manager of the supervision consultants.</li> <li>• Recording and resolution of grievances and reporting these to the Supervision Consultant in their monthly progress reports.</li> </ul>
<b>Supervision Consultant</b>	<ul style="list-style-type: none"> <li>• Evaluating and addressing the received applications together with the Contractor's Social Specialist/OHS Specialist or if deem necessary the management of the contractors' and the Project Managers (of supervision consultants) will involve the resolution process of the applications.</li> <li>• Monitoring the contractors' recording and resolution of grievances and reporting these to PIU in their monthly progress reports.</li> </ul>

### Dissemination of the Grievance Mechanism

MoEUCC will provide leaflets and other means of information (official letters, notice boards, official website of MoEUCC, consultation meetings, etc.) to inform the communities about the project, project activities to be carried out and renovation/retrofitted of the public buildings.

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



MoEUCC/PIU will also conduct numbers of 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 to the Project and at the PDoEUCC's.

### **Submission of a Request**

#### ***Who May Use the Grievance Mechanism?***

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

- Project's beneficiaries;
  - Staff of PV Panel installed buildings (teachers, healthcare professionals and contracted workers at the buildings, etc.)
  - Beneficiaries of PV Panel installed buildings (students, patients, visitors, and their families, etc.)
- Communities which could potentially be affected by the construction/renovation/retrofitted activities at the buildings (visitors, surrounding residence etc.)
- Employees of DSI Consultants, feasibility consultants 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, same process will be followed as 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) has a hotline `Alo181` which is both accessible via phone and website. This hotline serves also as a ministerial level grievance mechanism for its employees, partners and wider public. Request/suggestion/grievance about all environmental and urban services provided by MoEUCC are responded by a professionally managed call center.

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

<b>MoEUCC Call Center</b>	Alo 181
<b>Telephone</b>	+ 90 312 586 49 06
<b>Grievance Forms</b>	
<b>E-mail</b>	yigmenerji@csb.gov.tr
<b>Provincial Directorates of Environment, Urbanization And Climent Change (PDoEUCC)</b>	Alo 181 PUMREP Grievance Forms disclosed on the official webpage of the respective PDoEUCC.
<b>Contractors</b>	Forms that are available at construction sites (Annex 1-2)

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>  
<https://giris.turkiye.gov.tr/>

---

**Hotline** Alo 150

---

**Phone** +90 312 590 2000

---

**Fax** +90 312 473 6494

Within the scope of PUMREP Project, request/suggestion/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) **DSI Consultant:** The DSI consultants will be responsible for supplying grievance boxes, installing them in each building, designing and printing posters and brochures about the grievance mechanism and the project, registering grievances/concerns/suggestions by filling out the Complaint and Suggestion Form (provided in Annex 1 and 2 respectively), taking necessary actions to address the grievances/concerns/suggestions, sending the records to the Supervision Consultant and PIU on weekly basis. The DSI Consultant is also responsible to setting up a Grievance Mechanism (GM) for the project workers which will be detailed in further section.
- b) **Supervision Consultant:** Each Supervision Consultant will be responsible for receiving, recording and if possible, resolving the grievances/concerns/suggestions that are raised by any stakeholder (public building management, building users, visitors, host communities, or beneficiaries, etc.) due to the installation works within the scope of the PUMRE Project. If the social specialist of the Supervision Consultant is not able to resolve the grievances/concerns/suggestions, they are obliged to direct them to the project manager. If the Project Manager is not able to resolve the requests/suggestions/grievances, he/she is obliged to direct them to the PIU. The Supervision Consultant is obliged to send the record of the grievance/concern/suggestions to the MoEUCC PIU on monthly basis.
- c) **Provincial Directorates of Environment, Urbanization and Climent Change Level:** Provincial Directorates of Environment, Urbanization and Climent Change will be responsible for taking the necessary measures to address received grievance/concern/suggestions regarding the activities carried out within the scope of the PUMRE Project to the extent possible. The PDoEUCC is obliged to send the record of the grievance/concern/suggestions to the MoEUCC on monthly basis. The MoEUCC Provincial Directorates responsible for supervision works will also be responsible for the implementation of the GRM Procedure.
- d) **MoEUCC Level:** Within the scope of PUMRE Project, MoEUCC is responsible to collect, record, and resolve all grievance/concern/suggestion raised by stakeholders through the above-mentioned levels. There will be a central grievance record to be kept by the social specialist of PIU. MoEUCC is responsible for resolving the collected grievance/concern/ suggestion within 30 days and informing the owner of the grievance/concern/ suggestion about the result. The MoEUCC currently has a call center (Alo181) that can be accessed via both phone and website. This call center is used for all site-related issues for the projects that are being implemented by the MoEUCC. Call center officers will be informed about the PUMRE project. All complaints/opinions/suggestions coming to ALO181 will be directed to PIU by the call center officers. The MoEUCC/GDCA will

operate a website for PUMRE Project where all relevant information is being disclosed for public opinion and review. Through the complaint submissions section and e-mail address ([yigmenerji@csb.gov.tr](mailto:yigmenerji@csb.gov.tr)) that will be available in 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 enabled. This GM procedure will be used for all parties above mentioned. The roles and responsibilities of all parties are detailed in this procedure to ensure the successful implementation of the GM. PIU will lead to the GM and provide support to all parties if deemed necessary.

## **Registration**

The requests/suggestions/grievances raised by any stakeholder (including but not limited to; workers of the PUMRE Project, public building management, building users, visitors, surrounding residents, or beneficiaries, etc.) due to the executed civil works will be logged in the Grievance Table (Annex 2) 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 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. In order 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 and PDoEUCC 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 request/suggestion/grievance will be recorded by the responsible personnel of the Supervision Consultant and PDoEUCC 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 on monthly basis.

### ***Grievance Registration Process of Alo 181***

Headquarter of Alo 181 has been informed about the PUMRE Project and it currently receives, and records all inquiries received on PUMRE Project and conveys them to the PIU of the PUMRE 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 type of the recorded complaint 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 responsible person. If the issues/disputes raised are not related to the Project, guidance is provided to the Complainant to contact 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 maximum 30 calendar days) this should be agreed between the Supervision Consultant/PIU and the complainant. The applicant should be informed about the closure of the request.

All parties of GM is 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 5.

**Table 5. 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
DSI Consultant	When contractor's worker issues a complaint	Social Specialists of the Supervision Consultant	<p>The complaint will be directed to the management of the contractor.</p> <p>The Project manager of the supervision consultant will be immediately informed about the grievance received.</p> <p>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.</p> <p>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.</p> <p>The response with appropriate solution and actions to be taken will be prepared and shared with the complainant.</p>	Project Manager of Supervision Consultant PIU	<p><b>If the worker is satisfied with the explanation provided and actions taken</b>, the Close-Out Form with corrective actions and explanations will be signed by complainant.</p>	<p><b>In case of disagreement</b>, the complaint will be directed to the PIU.</p> <p>PIU will organize a meeting with the worker and to further assess potential corrective actions those can be taken and additional information to be provided, as appropriate.</p> <p><b>If the worker is still dissatisfied</b> with the recommended additional actions or explanation, s/he will be informed about appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
Supervision Consultant	If an answer/ corrective action can be provided immediately	Social Specialist of the Supervision Consultant	<p><b>If the complaint verbal</b>, it will be recorded in Grievance/ Suggestion forms (this action will be taken for all type of grievances).</p> <p>Social specialist will draft a response with explanations corrective actions.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p>	Management of Supervision Consultant Contractor	<p><b>If the complainant is satisfied</b> with the answers and actions taken, the Close-Out Form with corrective actions and explanations will be signed by complainant</p>	<p>Further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</p> <ul style="list-style-type: none"> <li>• <b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If it cannot be ensured whether the complaint is eligible or not	Social Specialist of the Supervision Consultant	<p>Further-assessment will be made by the management.</p> <p><b>If the management decides the grievance is relevant to PUMRE Project activities and is eligible for assessment</b>, the Social Specialists of the Supervision Consultant will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p> <p><b>If the management decides the complaint is NOT relevant to PUMRE</b>, and guidance will be provided to contact relevant party(-ies).</p>	Management of Supervision Consultant	<p><b>If the complainant is satisfied</b> with the answers and actions taken, the Close-Out Form with corrective actions and explanations will be signed by complainant.</p>	<p><b>Once the submitted request is clarified to be assessed under the Project's GM</b> and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</p> <ul style="list-style-type: none"> <li>• <b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>

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 the submitted grievance or concern is indefinite or is not clear enough	Social Specialist of the Supervision Consultant	<p>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.</p> <p><b>After necessary revisions are made on 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.</b></p>	Management of Supervision Consultant	<b>If the complainant is satisfied</b> with the answers and taken actions, the Close-Out Form with corrective actions and explanations will be signed by complainant.	<p><b>Once the submitted request is clarified to be assessed under the Project's GM</b> and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If the issues/disputes are related to the project but cannot be addressed at Supervision Consultant level	Management of Contractor and Project Manager of the Supervision consultant	<p>Draft assessment will be sent to GM contact person of the PIU by the Supervision Consultant.</p> <p>Considering the draft assessment shared by the Supervision Consultant, GM contact person of the PIU will draft a response with explanations and corrective actions to be taken.</p> <p>The final response will be prepared and shared with the complainant.</p>	PIU/MoEUCC	<b>If the complainant is satisfied with the explanation provided and actions taken</b> , the Close-Out Form with corrective actions and explanations will be signed by complainant.	<p>If there is still a disagreement with the actions taken, further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• <b>Virtual or individual meeting</b> would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	When Supervision Consultant's worker issue a complaint	Project Manager and/or headquarter of Supervision Consultant	<p>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.</p> <p>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.</p> <p>The response with appropriate solution and actions to be taken will be prepared and shared with the complainant.</p>	<p>Project Manager of Supervision Consultant</p> <p>PIU/MoEUCC</p>	<b>If the worker is satisfied with the explanation provided and actions taken</b> , the Close-Out Form with corrective actions and explanations will be signed by complainant.	<ul style="list-style-type: none"> <li>• Virtual or individual meeting would be conducted with the worker in order to discuss, propose and agree on any other correction actions.</li> <li>• If 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.</li> <li>• If the worker is still dissatisfied with the recommended actions of explanation, s/he will be informed about the appeal process.</li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>

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
Provincial Directorate of MoEUCC	If an answer/ corrective action can be provided immediately	GM Contact person of the PDoEUCC	<p><b>If the complaint verbal</b>, it will be recorded in Grievance/ Suggestion forms (this action will be taken for all type of grievances).</p> <p>Social specialist will draft a response with explanations corrective actions.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p>	Management of PDoEUCC	<p><b>If the complainant is satisfied</b> with the answers and actions taken, the Close-Out Form with corrective actions and explanations will be signed by complainant</p>	<p>Further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close- Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If it cannot be ensured whether the complaint is eligible or not	GM Contact person of the PDoEUCC	<p>Further-assessment will be made by the management.</p> <p><b>If the management decides the grievance is relevant to PUMRE Project activities and is eligible for assessment</b>, the Social Specialists of the Supervision Consultant will assess the application and will draft a response to the Complainant with explanations and corrective actions to be taken.</p> <p>Feedback including explanation and corrective necessary actions to be taken will be shared with the complainant.</p> <p><b>If the management decides the complaint is NOT relevant to PUMRE</b>, and guidance will be provided to contact relevant party(-ies).</p>	Management of PDoEUCC	<p><b>If the complainant is satisfied</b> with the answers and actions taken, the Close-Out Form with corrective actions and explanations will be signed by complainant.</p>	<p><b>Once the submitted request is clarified to be assessed under the Project's GM</b> and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting face meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close- Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If the submitted grievance or concern is indefinite or is not clear enough	GM Contact person of the PDoEUCC	<p>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.</p> <p><b>After necessary revisions are made on the complaint to ensure it is detailed enough for assessment and the complaint is assessed</b>; <i>feedback including necessary actions taken will be sent to the complainant.</i></p>	Management of PDoEUCC	<p><b>If the complainant is satisfied</b> with the answers and taken actions, the Close- Out Form with corrective actions and explanations will be signed by complainant.</p>	<p><b>Once the submitted request is clarified to be assessed under the Project's GM</b> and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.</p> <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close- Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>

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 the issues/disputes are related to the project but cannot be addressed at PDoEUCC level	GM Contact person of the PDoEUCC	Draft assessment will be sent to GM contact person of the PIU by the Supervision Consultant.  Considering the draft assessment shared by the Supervision Consultant, GM contact person of the PIU will draft a response with explanations and corrective actions to be taken.  The final response will be prepared and shared with the complainant.	PIU/MoEUCC	<b>If the complainant is satisfied with the explanation provided and actions taken</b> , the Close-Out Form with corrective actions and explanations will be signed by complainant.	If there is still a disagreement with the actions taken, further assessment will be taken by the PIU.  <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• <b>Virtual or individual meeting</b> would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If the complaint is related to the activities of an on-going sub-project	GM Contact person of the PDoEUCC	<b>In case an answer/corrective action can be taken immediately</b> ; the responsible person will take the required corrective action to resolve the grievance and inform the PIU/MoEUCC about 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.	Contact person of the PDoEUCC	If the complainant is satisfied with the explanation provided and corrective actions 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.  <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another correction action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If agreement is ensured</b>, the proofing documents for the corrective actions taken will be collected and attached to the Grievance Close-Out Form to be signed by complainant.</p> <p><b>If the complainant does not satisfy with the solution</b>, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	When PDoEUCC's officer issue a complaint	Project Manager and/or headquarter of PDoEUCC	If the grievance can be resolved immediately, the Project Manager or the HQ of the PDoEUCC 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 appropriate solution and actions to be taken will be prepared and shared with the complainant.	Project Manager and/or headquarter of PDoEUCC PIU/MoEUCC	<b>If the worker is satisfied with the explanation provided and actions taken</b> , the Close-Out Form with corrective actions and explanations will be signed by complainant.	<ul style="list-style-type: none"> <li>• Virtual or individual meeting would be conducted with the worker in order to discuss, propose and agree on any other correction actions.</li> <li>• If 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.</li> </ul> <p>If the worker is still dissatisfied with the recommended actions of explanation, s/he will be informed about the appeal process.</p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>



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/MoEUC	When an answer/ corrective action can be provided immediately.	Contact Person of the PIU	If the complaint is verbal, it will be recorded in online grievance & suggestion form (this action will be taken for all type 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/MoEUC	If the complainant is satisfied with the explanation provided and corrective actions 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/MoEUC for further assessment.  <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another correction action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If 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 complainant.</b></p> <p><b>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</b></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	If it cannot be ensured whether the complaint is eligible or not	PIU/MoEUC	Further-assessment will be made by PIU/MoEUC.  <b>If the PIU &amp; MoEUC decides the grievance is relevant to PUMRE Project activities and is eligible for assessment,</b> the PIU contact person 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.  <b>If the PIU &amp; MoEUC decides the grievance is NOT relevant to PUMRE Project activities and is NOT eligible for assessment,</b> the Complainant will be informed; accordingly, and guidance will be provided to contact relevant party(-ies).	PIU Director	Feedback including necessary actions taken will be sent to the complainant.  <b>If the complainant is satisfied</b> with the answers and actions taken, the Close-Out Form with corrective actions and explanations will be signed by complainant.	If the complainant is not satisfied with the result, the grievance will be conveyed to the PIU/MoEUC for further assessment.  <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another correction action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If 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 complainant.</b></p> <p><b>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</b></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	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.  <b>After necessary revisions are made on the complaint to ensure it is detailed enough for assessment and the complaint is assessed;</b> feedback including necessary actions taken will be sent to the complainant.	PIU Director	<b>If the complainant is satisfied</b> with the answers and taken actions, the Close-Out Form with corrective actions and explanations will be signed by complainant.	<b>Once the submitted request is clarified to be assessed under the Project's GM</b> and if there is still a disagreement with the actions taken, further assessment will be taken by the PIU.  <ul style="list-style-type: none"> <li>• <b>Site visit</b> would be held to collect more information about the issue/dispute, if appropriate.</li> <li>• Virtual or individual meeting would be conducted with the complainant in order to propose another corrective action, if possible.</li> <li>• Final response will be prepared in line with the additional corrective actions (if any) and submitted to the complainant.</li> </ul> <p><b>If 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 complainant.</b></p> <p><b>If the complainant does not satisfy with the solution, s/he will be informed about the appeal process.</b></p>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> <li>• Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>
	When member/s of PIU issues a complaint	MoEUC General Directorate of Personnel	The PIU member will submit their grievances to the General Directorate of Personnel with a petition.  General Directorate of Personnel will forward the grievance to any other department (rather than "External Investments Department Directorate") within the ministry.	General Manager GDoCA of	<b>If the complainant is satisfied</b> with the answers and taken actions, the Close-Out Form with corrective actions and explanations will	<ul style="list-style-type: none"> <li>• <b>If the complainant does not satisfy with the solution, s/he is informed about appeal proses</b></li> </ul>	<ul style="list-style-type: none"> <li>• CIMER</li> <li>• Civil Courts of First Instance</li> <li>• Administrative Court</li> <li>• Commercial Courts of First Instance</li> <li>• Labor Courts</li> </ul>

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
			<p>This department will select an "Assessor". Assessor will evaluate the grievance, make necessary inquiries, and reveal a summary report with corrective action(s).</p> <p>Summary report will be assessed by Head of Department of <b>External Investments- General Directorate of Construction Affairs (EIDGDoCA)</b>. General Manager will make a final decision and complainant will be informed about the decision.</p>		be signed by complainant.		<ul style="list-style-type: none"> <li>Ombudsman <a href="https://ebasvuru.ombudsman.gov">https://ebasvuru.ombudsman.gov</a></li> </ul>

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 decision making process and inform proposed remedy.

### **Feedback**

If the grievance has not been resolved, 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 contains 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). (<https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>) GS ensures that the received grievances are quickly examined in order to eliminate the 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 for every six-months in project progress reports.

A number of Key Performance Indicators (KPIs) will also be monitored and integrated into project progress report by the project on a regular basis, 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

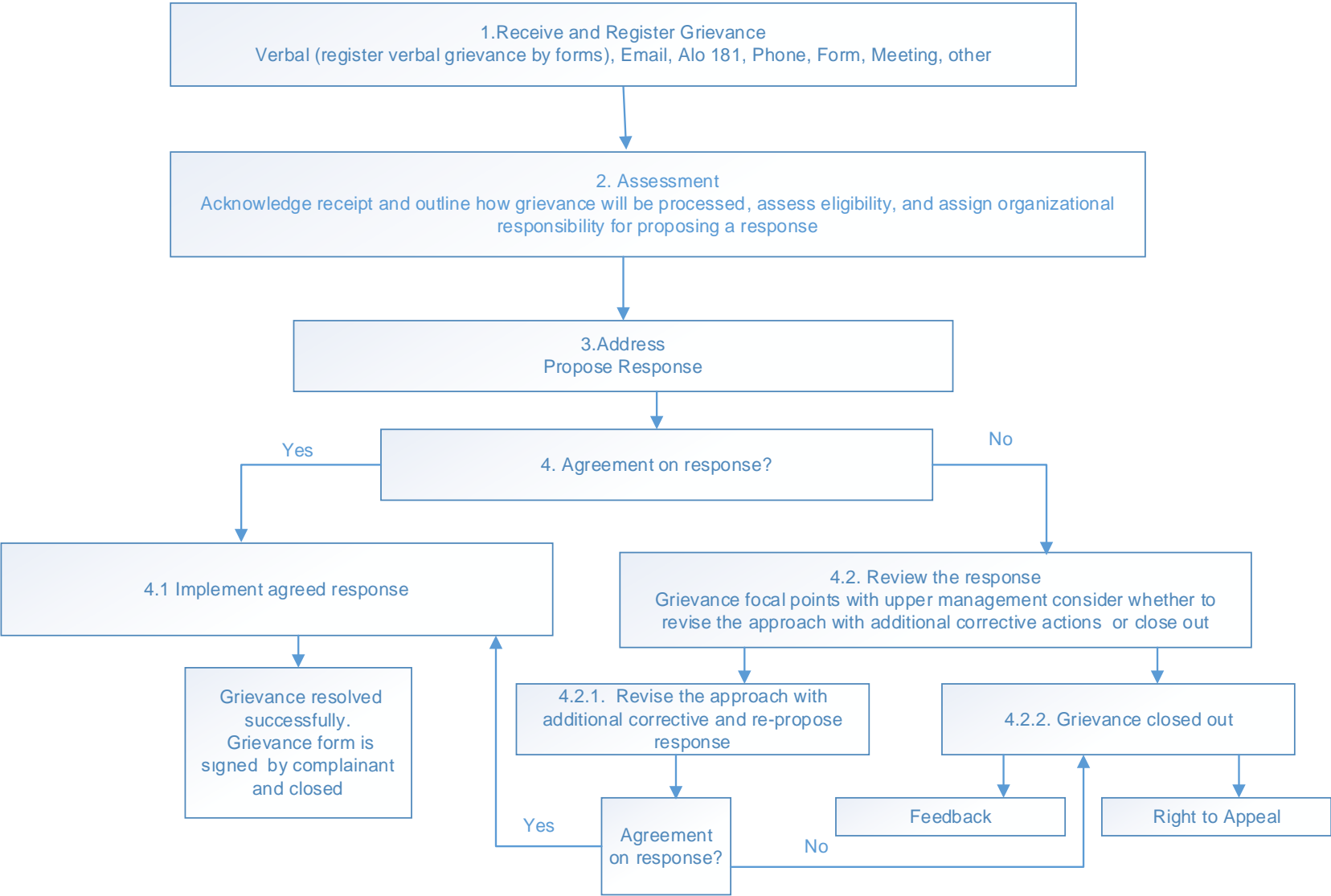
Responsible parties regarding GM reporting and requirements on reporting process are provided in Table 3.

**Table 6 GM Reporting and Requirements on Reporting Process**

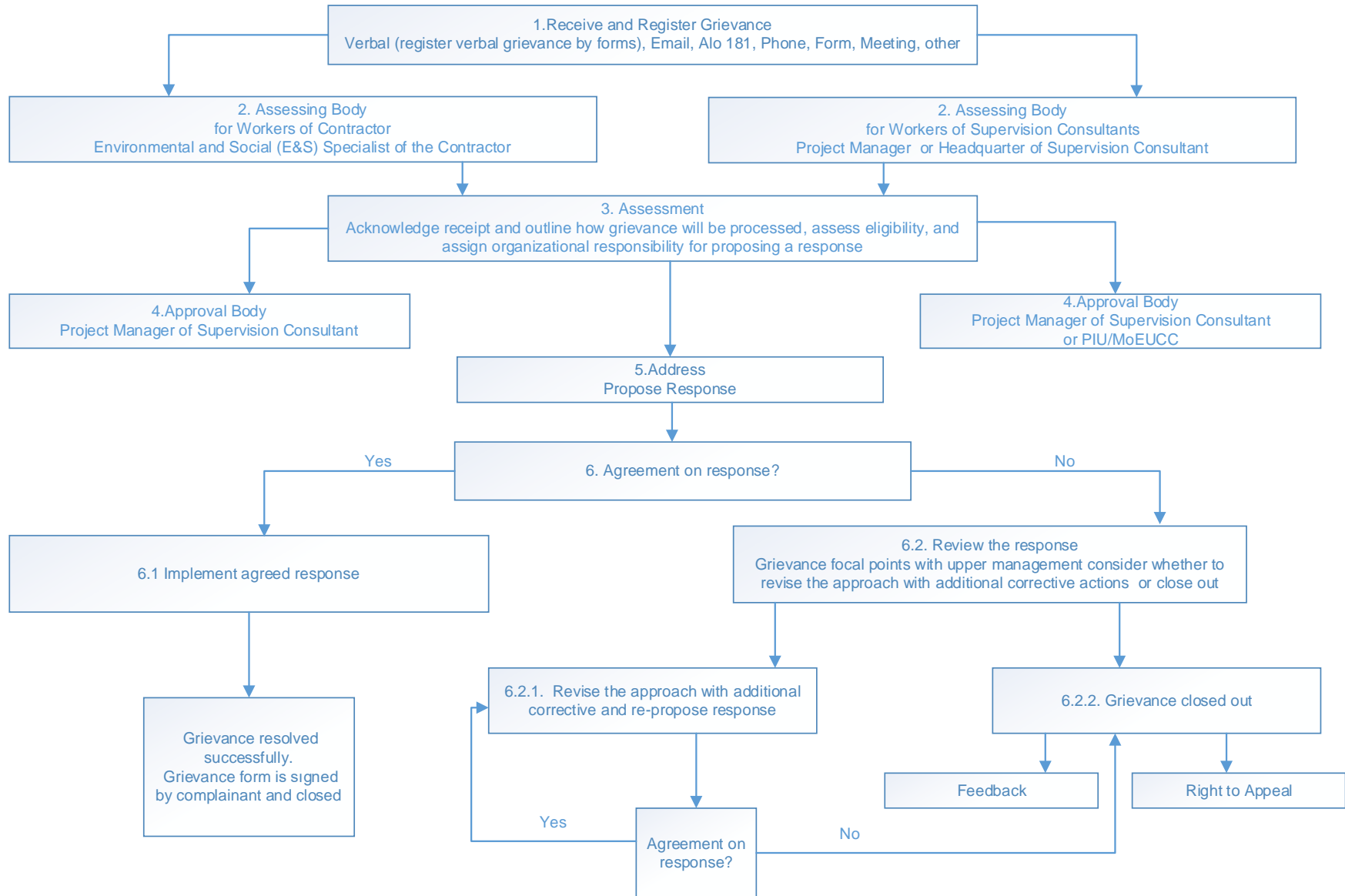
Responsible Party	Reporting Process Requirements
<b>Social Specialists of the Contractor</b>	<p>Submit Monthly Reports to the Project Manager of Supervision Consultants, which shall include a Grievance Table as an annex related to GM including updated information on the following:</p> <ul style="list-style-type: none"> <li>• Quantitative data on number of received applications (suggestions, complaints, requests, positive feedback), and number of resolved grievances,</li> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• Summary of correction measures taken,</li> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul>
<b>Building Administration</b>	<p>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.</p>
<b>Supervision Consultants</b>	<p>Submit Monthly Reports to the PIU, which shall include the contractor's report including,</p> <ul style="list-style-type: none"> <li>• Quantitative data on number of received grievances (applications, suggestions, complaints, requests, positive feedback), and number of resolved grievances,</li> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• summary of correction measures taken,</li> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul>
<b>PDoMoEUCC</b>	<p>Submit Grievance Table to the PIU on weekly basis.</p>
<b>The PIU's GM contact person</b>	<p>Submit Quarterly Reports to the PIU, which shall include following items related to the management of the received grievances,</p> <ul style="list-style-type: none"> <li>• Quantitative data on number of received applications (suggestions, complaints, requests, positive feedback) from various intake channels (<b>PDoMoEUCC</b>, PIU, meetings, scorecards, Alo 181, online forms etc.) and number of resolved grievances,</li> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• Summary of correction measures taken,</li> </ul>

	<ul style="list-style-type: none"> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul>
<b>MoEUCC/PIU</b>	<p>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:</p> <ul style="list-style-type: none"> <li>• Status of GM implementation (procedures, training, public awareness campaigns, budgeting etc.),</li> <li>• Quantitative data on number of received applications (, suggestions, complaints, requests, positive feedback), and number of resolved grievances, <ul style="list-style-type: none"> <li>• Qualitative data on the type of grievances and responses, issues provided and grievances that remain unresolved, level of satisfaction by the measures (response) taken,</li> <li>• Summary of corrective actions taken,</li> <li>• Disaggregated data (gender, province, etc.) about the received grievances.</li> </ul> </li> </ul>

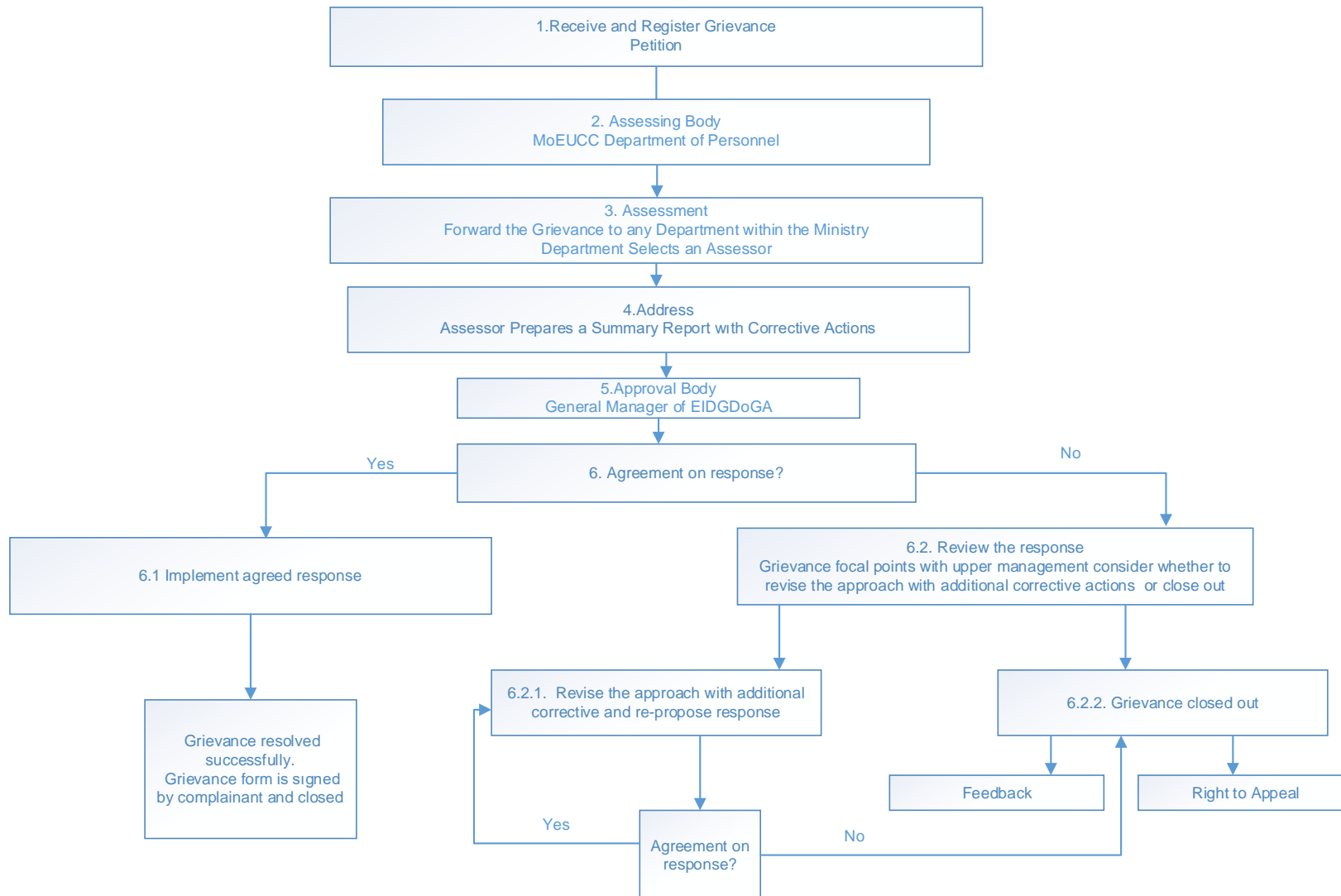
# GRIEVANCE MECHANISM FLOWCHART



## WORKERS GRIEVANCE MECHANISM FLOWCHART



## PIU GRIEVANCE MECHANISM FLOWCHART





Annex- 5 Photos And Participant List of Stakeholder Engagement Meeting



The List of Participants is given as a separate document