

Republic of Türkiye
Ministry of Environment, Urbanization and Climate
Change

General Directorate of Construction Affairs

Public and Municipal Renewable Energy Project
(P179867)

Stakeholder Engagement Plan for
Universities and Dormitories

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Executive Summary

Within the scope of the Public and Municipal Renewable Energy Project (“PUMREP”), funded by the World Bank (“WB”), carried out by the General Directorate of Construction Affairs (“GDCA”) of the Ministry of Environment, Urbanization and Climate Change (“MoEUCC”), under the financial guarantee of the Ministry of Treasury and Finance, it is planned to install solar power plants on the open car parks and roofs of institutions in order to meet all or part of the electrical energy consumption of central government buildings. This sub-project, which will be carried out in universities and dormitories is a sub-project developed within the scope of PUMREP.

This Stakeholder Engagement Plan (“SEP”) describes the planned stakeholder consultation and engagement process for sub-projects which will be implemented in universities and dormitories within the scope of the PUMREP. This SEP is formed in accordance with the ‘World Bank’s Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure’ and one of the documents prepared for management of sub-project’s Environmental and Social (“E&S”) aspects.

The objectives of this SEP are the identification of the sub-project stakeholders and the establishment of their rules for management of exchange of information between the sub-project implementers and the stakeholders in line with the national regulation and the WB Requirements. The purpose of the SEP is to present plans to communicate with stakeholders who may be affected by or will be interested in the sub-project throughout the sub-project life cycle. This SEP also describes a grievance mechanism, which is a process that stakeholders may use to raise any concerns about the sub-project providing their opinions that may influence the project implementation and its results.

Throughout the sub-project lifecycle, the requirements outlined in this SEP shall be fulfilled, and the consultation and engagement processes with the stakeholders identified in this SEP shall be carried out.

This SEP has been prepared in accordance with the requirements of national and international regulatory framework regarding stakeholder participation that sub-projects which will be implemented in universities and dormitories shall comply with (See Section 3).

Stakeholders of the sub-project were identified in Section 5 for each of following categories: (i) affected parties, (ii) other interested parties and (iii) disadvantaged/vulnerable individuals or groups. Each stakeholder group was presented along with the level of impact of the sub-project on each specific stakeholder group and the level of influence of the stakeholder group on the sub-project. Besides, the stakeholder groups identified as other interested parties were given with their potential interest relationship. Disadvantaged or vulnerable individuals and groups in the context of this sub-project will be people with physical disabilities, women, elderly and refugees 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 sub-project.

The identified vulnerable groups and the proposed ways of communication were also emphasized.

For the sub-project, stakeholders will be engaged as early as possible and will continue the engagement throughout the implementation until the sub-project is finished. Table 4 under Section 6 presents the stakeholder engagement plan developed for the sub-project including engagement technique for each stakeholder group, sub-project phases for proposed engagement and the responsible party for engagement. This plan will be implemented throughout the sub-project.

A stakeholder engagement activity has yet to be carried out specifically for this sub-project. After the initial approval of the documents, i.e., Environmental and Social Management Plan (“ESMP”)/ ESMP Checklist, SEP and Occupational Health and Safety (“OHS”) Plan, prepared by the Feasibility Consultant on the management

of the E&S aspects of the sub-project by the WB and Project Implementation Unit (“PIU”) at GDCA, a stakeholder engagement meeting will be held with the consultancy of the Feasibility Consultant and under the auspices of the sub-project beneficiary. Within the scope of information disclosure, at least seven days before the stakeholder engagement meeting, the sub-project related E&S documents will be made publicly available on PUMREP website as well as sub-project beneficiary’s website. In the invitations sent to stakeholders, the links to the websites will be posted with a clarification note emphasizing the fact that the E&S documents are available for their prior review. After the meeting, the Feasibility Consultant will review the E&S documents to revise, if necessary, per the stakeholders’ concerns and opinions. The reviewed E&S documents will then be finalized with the final approval of the WB and PIU within the GDCA. The final versions of the E&S documents will be uploaded to the PUMREP website and sub-project beneficiary’s website to make them publicly available.

Ongoing feedback and comments received from the stakeholders throughout the sub-project implementation will be reviewed and necessary corrective actions will be addressed/undertaken by the Supervision Consultant’s social experts with collaboration of social expert of PIU to ensure smooth implementation of the sub-project. Additionally, sub-project Grievance Mechanism (detailed in Section 8) will be in place during the entire lifetime of the sub-project to receive any concerns from both internal and external stakeholders.

The PUMREP PIU within the GDCA is responsible for overall implementation of the PUMREP, including implementation of the PUMREP SEP. The Feasibility Consultant is responsible for feasibility studies for the sub-projects and develop and finalize E&S documents for each sub-project. These tasks are conducted before the commencement of project activities. Design-Supply-Installation (“DSI”) Consultant will be responsible for the design, supply, and installation of solar power plant and also in charge of complying with all environmental and social mitigation measures, requirements, and procedures, and for the implementation of the respective sub-project specific ESMPs/ESMP Checklist, SEP, and OHS Plan. All DSI Consultants in charge of carrying out specific sub-project activities will also be required to implement the relevant provisions of this sub-project SEP. The Supervision Consultant will be responsible for auditing, monitoring, and reporting on the sub-project implementation at a regional level. The grievance mechanism requirements will be the responsibility of the Supervision Consultants.

As explained in Section 8, the Grievance Mechanism (“GM”) is an arrangement that enables any stakeholder to submit their grievances/concerns/suggestions on how the sub-project is planned, constructed, or implemented. To achieve transparency and accountability and meet the related standards of WB, GM will be established for the PUMREP and each sub-project and implemented during the project life cycle.

Within the scope of PUMREP, grievances/concerns/suggestions will be handled at multiple levels: (i) DSI Consultant level, (ii) Supervision Consultant level, (iii) PDoEUCC level, and (iv) National level through MoEUCC PUMREP PIU. The roles and responsibilities of representatives for each of the level are detailed in Section 8. The DSI Consultant, Supervision Consultant, PDoEUCC and PUMREP PIU will provide written acknowledgement of receipt of the grievance within 2 days of receiving the grievance and resolve the grievance within 15 days of receiving the grievance.

Any grievance/concern/suggestion can be brought to the attention of the DSI Consultants verbally or in writing (by post or e-mail) or by filling in Grievance and Suggestion Form. Grievance and Suggestion Forms will be made available in the sub-project areas that are easily accessible for all relevant stakeholders. The Grievance and Suggestion Form will also be revealed on the website of the PUMREP operating by GDCA (www.kamuenerji.csb.gov.tr) and/or relevant government authorities, where the sub-project activities will be implemented. Nominated and trained members of staff will record grievance information in a Grievance and Suggestion Log (See Section 8.2 for details). Requirements and responsibilities for recording, monitoring and reporting grievances are given in Section 8.3.

A separate grievance mechanism will be available for the workers (See Section 8.1), 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. Building awareness on gender-based violence and abuse in the workplace for female workers (both at the construction site and in the buildings under the project) and establishing a GM hotline for such issues will be emphasized. There will also be awareness raising discussions with both men and women regarding appropriate workplace behavior.

In conclusion, the SEP for this sub-project under PUMREP establishes a comprehensive framework for ensuring active participation, transparency, and accountability throughout the project lifecycle. By identifying stakeholder groups, outlining communication strategies, and implementing a grievance mechanism, the SEP aims to foster collaboration between the sub-project implementers and the affected or interested parties. The SEP is aligned with both national regulations and the World Bank's standards to manage environmental and social impacts effectively. Continuous engagement, grievance handling, and feedback mechanisms will be central to ensuring the sub-project's success and addressing any concerns in a timely and inclusive manner.

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Abbreviations

CİMER	Presidency's Communication Center
CIP IF	Climate Investment Fund Investment Plan
DSI	Design-Supply-Installation
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GDCA	General Directorate of Construction Affairs
GM	Grievance Mechanism
IBRD	International Bank for Reconstruction and Development
LMP	Labor Management Plan
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PDoEUCC	Provincial Directorate of Environment, Urbanization and Climate Change
PIU	Project Implementation Unit
PUMREP	Public and Municipal Renewable Energy Project
SEP	Stakeholder Engagement Plan
WB	World Bank
YİMER	Foreigners Communication Center

1 Project Description

Within the scope of the Public and Municipal Renewable Energy Project (“PUMREP”), funded by the World Bank (“WB”), carried out by the General Directorate of Construction Affairs (“GDCA”) of the Ministry of Environment, Urbanization and Climate Change (“MoEUCC”), under the financial guarantee of the Ministry of Treasury and Finance, it is planned to install solar power plants on the open car parks and roofs of institutions in order to meet all or part of the electrical energy consumption of central government buildings. In this way, it is aimed to increase the use of renewable energy in public buildings.

PUMREP will be financed by a loan from the International Bank for Reconstruction and Development (“IBRD”) and is expected to be supported by a grant from the Climate Investment Fund Investment Plan (“CIF IP”). The Project includes three components: (i) renewable energy investments in central government buildings; (ii) renewable energy investments in municipal buildings and (iii) technical assistance and implementation support.

Detailed information about PUMREP is published on the PUMREP website (<https://kamuenerji.csb.gov.tr/kayep-projesi-i-110689>).

Sub-projects for the establishment of solar power plants in universities and dormitories have been developed within the scope of PUMREP.

2 Purpose of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (“SEP”) describes the planned stakeholder consultation and engagement process for sub-projects which will be implemented in universities and dormitories within the scope of the PUMREP. This SEP is formed in accordance with the ‘World Bank’s Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure’ and one of the documents prepared for management of sub-project’s Environmental and Social (“E&S”) aspects.

Stakeholder engagement is an inclusive process conducted throughout the projects’ life cycles. Where properly designed and implemented, it supports the development of strong, constructive, and responsive relationships that are important for successful management of the projects’ environmental and social risks. Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays.

The objectives of this SEP are the identification of the sub-project stakeholders and the establishment of their rules for management of exchange of information between the sub-project implementers and the stakeholders in line with the national regulation and the WB Requirements. The purpose of the SEP is to present plans to communicate with stakeholders who may be affected by or will be interested in the sub-project throughout the sub-project life cycle. This SEP also describes a grievance mechanism, which is a process that stakeholders may use to raise any concerns about the sub-project providing their opinions that may influence the project implementation and its results.

Throughout the sub-project lifecycle, the requirements outlined in this SEP shall be fulfilled, and the consultation and engagement processes with the stakeholders identified in this SEP shall be carried out.

3 Regulatory Framework

3.1 National Legislation for Stakeholder Engagement

The 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: Article 25, 26 and 74 of the Constitution emphasize citizens' freedom of thought and opinion, having right to express and disseminate his/her thoughts and opinions and having the right to apply in writing to the authorities regarding to the requests and complaints concerning themselves or the public, respectively.
- Law on the Right to Information No. 4982: This Law defines the process concerning the right to information in line with the principles of equality, impartiality, and transparency, which are the prerequisites of democratic and transparent administration.
- Law on Use of the Right to Petition No. 3071: This Law emphasizes that the citizens are entitled to apply to authorities by written petition, in respect to their requests and complaints.
- Regulation on Environmental Impact Assessment: This regulation describes the assessment process and lists the project types determining which process of environmental impact assessment to be undertaken.
 - As the sub-project is out of scope of Regulation on Environmental Impact Assessment, i.e., listed neither in Annex-1 nor in Annex-2 of regulation, no environmental impact assessment will be performed for the sub-project. Besides, as the sub-project is not listed in Annex-1 of the regulation, no national SEP will be prepared per this regulation.
 - On the other hand, since PUMREP is funded by WB, following the WB requirements, this SEP was developed for sub-project implementers to follow and implement.

3.2 International Legislation for Stakeholder Engagement

UN Universal Declaration of Human Rights, which is a milestone document in the history of human rights, defines 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 WB developed an Environmental and Social Framework (“ESF”) setting out the WB’s commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards (“ESSs”) that are designed to support projects, with the aim of ending extreme poverty and promoting shared prosperity. The ESSs set out the mandatory requirements that apply to the project owners 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 WB requirements is associated with ESS10 which recognizes “the importance of open and transparent engagement between the project owner 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 the ESS10: (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.

Within the framework of these principles and process defined in the PUMREP SEP, this SEP was prepared considering the features of the sub-project activities at the implementation stage, proportionate to the nature and scale of the sub-project and its potential risks and impacts.

4 Summary Of Previous Stakeholder Engagement Activities

A stakeholder engagement activity has yet to be carried out specifically for this sub-project. After the initial approval of the documents, i.e., Environmental and Social Management Plan (“ESMP”)/ ESMP Checklist, SEP and Occupational Health and Safety (“OHS”) Plan, prepared by the Feasibility Consultant on the management of the E&S aspects of the sub-project by the WB and Project Implementation Unit (“PIU”) at GDCA, a stakeholder engagement meeting will be held with the consultancy of the Feasibility Consultant and under the auspices of the sub-project beneficiary.

Stakeholder engagement activities to be carried out throughout the sub-project implementation are given in the following sections.

5 Stakeholder Identification

Sub-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 sub-project (‘affected parties’); and
- may have an interest in the sub-project (‘interested parties’). They include individuals or groups whose interests may be affected by the Project and who have the potential to influence the sub-project outcomes in any way.

In order to meet best practice approaches, the sub-project will apply the following principles for stakeholder engagement:

- Openness and life-cycle approach: Stakeholder consultations for the sub-project 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 sub-project 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 sub-project can be divided into the following core categories:

- **Project Affected Parties:** Persons, groups and other entities within the sub-project area of influence that are directly influenced (actually or potentially) by the sub-project and/or have been identified as most susceptible to change associated with the sub-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 sub-project but who consider or perceive their interests as being affected by the sub-project and/or who could affect the sub-project and the process of its implementation in some way.
- **Disadvantaged/Vulnerable Individuals or Groups:** Persons who may be disproportionately impacted or further disadvantaged by the sub-project 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 sub-project.

The determination of relevant stakeholders is of crucial importance to ensure meaningful consultation on the sub-project. The identified stakeholders at this stage are presented in the following sub-headings¹.

5.1 Project Affected Parties

Within the scope of the sub-project, a solar power plant will be installed in a designated area within the institution's premises. It is foreseen that the building users (teachers, students, visitors, employees working at universities and dormitories) will be affected by the installation processes to be carried out. There may

¹ Stakeholders that were not identified during this process should contact the sub-project beneficiary to request their addition to the list.

also be a very limited impact on residents around the universities and dormitories. No significant risk or impact is expected that will directly affect building users' and residents' daily lives adversely. These groups may experience temporary and predictable impacts related to the installation activities such as a potential exposure to noise and dust, traffic risks during transportation of materials, and disruption of access.

The following Table 1 lists the stakeholder groups identified as affected parties along with the level of impact of the sub-project on each specific stakeholder group and the level of influence of the stakeholder group on the sub-project.

Table 1. Stakeholder Groups as Affected Parties, The Level of Impact on the Group and The Level of Influence of the Group

Stakeholder Group	Level of Impact on the Group	Level of Influence of the Group
Administers, teachers, and other employees working at the facilities/buildings	High	High
Students, their families and visitors	High	Medium
Residents around the university/dormitory who could potentially be affected by the sub-project activities Landowners and land users adjacent to the sub-project area	High	Low
MoEUCC GDCA (As the PUMREP implementer)	Medium	High
Associated ministry (In terms of resulting energy saving)	High	High
Feasibility Consultant for the sub-project Desing, Supply and Installation ("DSI") Consultant for the sub-project Equipment suppliers and supplier workers Supervision Consultant for the sub-project	High	High
Local authorities (Local governors and municipalities) Administrations at the relevant or regional level (Regarding permit processes, if relevant)	Low	Medium
Non-Governmental Organizations ("NGOs") - Associations on local and national level (Turkish Women in Renewables and Energy, Green Collar Women's Association etc.) Media (social media, tv channels, printed media etc.) General public (Regarding the public contribution of the project)	Low	Medium

5.2 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 and potential vulnerable groups and the proposed ways of communication are detailed in Table 2 below.

Table 2. Identified and Potential Vulnerable Groups and Proposed Ways of Communication

Vulnerable Groups and Individuals Stakeholder Group	Characteristics/ Needs	Preferred means of notification/consultation	Additional Resources Required
People with physical disabilities (mobility, hearing, vision impairment, etc.)	Accessibility, lack of information and funding for training in special needs	Special communication needs such as audio devices, accessible venues, etc.	Special communication facilitators, sign language translators/ interpreters

6 Stakeholder Engagement Plan

Stakeholder engagement is an inclusive process conducted throughout the project life cycle (preparation, construction and operation phases). 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. 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.

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

Before starting of the sub-project, all affected parties will be informed about the sub-project's scope, contact information for their opinions and concerns and availability of the publicly available information on the PUMREP website and sub-project beneficiary website via consultation meetings, information boards, brochures and flyers, printed newspaper, websites or social media.

The sub-project implementers and sub-project beneficiary recognize 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.

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.

A variety of communication methods will be used as appropriate for each set of stakeholders. In general, these include:

- i. Public and individual consultation meetings,
- ii. Announcements in media,
- iii. Provision of general information on noticeboards at public locations,
- iv. Regular mail and email correspondence and
- v. Publication of relevant project information on the website of the PUMREP.

Table 3 below presents the stakeholder engagement plan developed for the sub-project including engagement technique for each stakeholder group, sub-project phases for proposed engagement and the responsible party for engagement. This plan will be implemented throughout the sub-project.

Table 3. Stakeholder Engagement Plan

Stakeholder Group	Engagement Technique	Sub-project Phase	Responsible Party
Administers, teachers, and other employees working at the facilities/buildings Students, their families and visitors	Public consultation meeting, and individual meetings as necessary	Before commencement of the sub-project activities During the construction/installation works	PIU Feasibility Consultant Supervision Consultant Sub-project beneficiary
Residents around the university/dormitory who could potentially be affected by the sub-project activities Landowners and land users adjacent to the sub-project area	Publishing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the sub-project buildings/facilities at least two weeks prior to the start of any construction works	Before commencement of the sub-project activities	DSI Consultant Supervision Consultant Sub-project beneficiary
	Informing through the media – radio/TV/social media (announcements)	Before commencement of the sub-project activities During the construction/installation works	PIU Sub-project beneficiary

Stakeholder Group	Engagement Technique	Sub-project Phase	Responsible Party
	Direct information through the local authorities Communication through bulletin boards (placed in appropriate places) and posting sub-project information/notices there	Before commencement of the sub-project activities During the construction/installation works	PIU Feasibility Consultant DSI Consultant Supervision Consultant PDoEUCC Sub-project beneficiary
	Group meetings with residents/employees or other groups using the buildings	Before starting with implementation of the project activities During the construction/installation works	DSI Consultant Supervision Consultant Sub-project beneficiary
	Direct communication with residents, companies, employees or other groups using the buildings etc.	Before starting with implementation of the project activities During the construction/installation works	PIU DSI Consultant Supervision Consultant Sub-project beneficiary
	Direct information via a contact person or person responsible for the implementation of the SEP	Before starting with implementation of the project activities During the construction/installation works	PIU DSI Consultant Supervision Consultant
Associated ministry	Official correspondence	Before starting with implementation of the project activities During the construction/installation works	PIU Supervision Consultant PDoEUCC Sub-project beneficiary
	Public consultation meeting, and individual meetings as necessary, public hearings	Before starting with implementation of the project activities During the construction/installation works	PIU Feasibility Consultant DSI Consultant Supervision Consultant PDoEUCC Sub-project beneficiary
	Individual meetings, if necessary	Before starting with implementation of the project activities During the construction/installation works	PIU Supervision Consultant PDoEUCC Sub-project beneficiary
Feasibility Consultant for the sub-project Desing, Supply and Installation ("DSI")	Information through tender procedure and Contracts	Before starting with implementation of the project activities	PIU Feasibility Consultant DSI Consultant Supervision Consultant

Stakeholder Group	Engagement Technique	Sub-project Phase	Responsible Party
Consultant for the sub-project Equipment suppliers and supplier workers Supervision Consultant for the sub-project	Individual meetings via supervising engineers	During the construction/installation works	PIU DSI Consultant Supervision Consultant Sub-project beneficiary
	Toolbox talks at construction sites on E&S topics	During the construction/installation works	DSI Consultant Supervision Consultant Sub-project beneficiary
	Trainings	During the construction/installation works	PIU DSI Consultant Supervision Consultant Sub-project beneficiary
Local authorities (Local governors and municipalities) Administrations at the relevant or regional level	Public consultation meetings, and individual meetings as necessary	Before starting with implementation of the project activities During the construction/installation works	PIU Feasibility Consultant DSI Consultant Supervision Consultant PDoEUCC Sub-project beneficiary
	Official correspondence	Before starting with implementation of the project activities During the construction/installation works	PIU Feasibility Consultant Supervision Consultant PDoEUCC Sub-project beneficiary
Interested NGOs	Public consultation meetings, and individual consultation meetings as necessary	Before starting with implementation of the project activities During the construction/installation works	PIU Feasibility Consultant DSI Consultant Supervision Consultant PDoEUCC Sub-project beneficiary
	Direct email communication	Before starting with implementation of the project activities During the construction/installation works	PIU Supervision consultant Sub-project beneficiary
	Media/press releases	Before starting with implementation of the project activities During the construction/installation works	PIU Sub-project beneficiary

During the whole life of the sub-project, gender, ethnic and cultural diversity of the stakeholders should be taken into consideration, especially for their engagement on the sub-project, 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

Once the sub-project E&S documents including ESMP/ESMP Checklist, SEP, and OHS Plan prepared by the Feasibility Consultant are obtained initial approval, a stakeholder engagement meeting (public consultation meeting) will be held with the consultancy of the Feasibility Consultant and under the auspices of the sub-project beneficiary.

Within the scope of information disclosure, at least seven days before the stakeholder engagement meeting, the sub-project related E&S documents will be made publicly available on PUMREP website as well as sub-project beneficiary's website. In the invitations sent to stakeholders, the links to the websites will be posted with a clarification note emphasizing the fact that the E&S documents are available for their prior review.

In the subject meeting, the PUMREP and sub-projects are informed to the stakeholders and potential E&S risks/impacts and proposed measures against the risks/impacts will be presented. The stakeholder engagement and consultation strategy in accordance with this SEP and the Grievance Mechanism will be introduced. After the questions and answers session in order for obtaining stakeholders' concerns and opinions, the meeting will end.

After the meeting, the Feasibility Consultant will review the E&S documents to revise, if necessary, per the stakeholders' concerns and opinions. The reviewed E&S documents will then be finalized with the final approval of the WB and PIU within the GDCA. The final versions of the E&S documents will be uploaded to the PUMREP website and sub-project beneficiary's website to make them publicly available.

Information prior and during sub-project implementation will be also made available through bulletin boards, brochures or leaflets to be distributed in regions where activities will be conducted. Media and press releases will contribute to information disclosure and subsequent consultation.

Table 3 above presents the stakeholder engagement plan developed for the sub-project including engagement technique for each stakeholder group, sub-project phases for proposed engagement and the responsible party for engagement. The responsible parties shall implement the activities plan identified in the plan and the Supervision Consultant and PIU shall follow the implementation.

Regarding stakeholder engagement meetings, there will be two more engagement meetings where the second meeting will be held during the construction/installation works and the third meeting to be held after the sub-project is completed. Under the management of PIU, with the supervision of Supervision Consultant, the DSI Consultants will hold the second and third meetings for 20% of the sub-projects to represent a sample of all sub-projects which would give feedback on the stakeholders' perceptions regarding the works conducted.

6.2 Proposed Strategy to Incorporate the View of Vulnerable Groups

Disadvantaged or vulnerable individuals and groups in the context of this sub-project will be people with physical disabilities, women, elderly and refugees 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 sub-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 sub-project will be provided in individual meetings, in different languages (Arabic, Kurdish etc.) and or in braille if required.
- Consultations will be conducted at locations which enable 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 sub-project's vulnerable groups.

6.3 Review of Feedback from Stakeholders

Ongoing feedback and comments received from the stakeholders throughout the sub-project implementation will be reviewed and necessary corrective actions will be addressed/undertaken by the Supervision Consultant's social experts with collaboration of social expert of PIU to ensure smooth implementation of the sub-project.

Additionally, sub-project Grievance Mechanism (detailed in Section 8) will be in place during the entire lifetime of the sub-project to receive any concerns from both internal and external stakeholders.

7 Implementation Arrangements for Stakeholder Engagement

The PUMREP PIU within the GDCA is responsible for overall implementation of the PUMREP, including implementation of the PUMREP SEP.

This sub-project specific SEP was prepared by the Feasibility Consultant and conducting first stakeholder engagement meeting is also the responsibility of the Feasibility Consultant. The Feasibility Consultant is responsible for feasibility studies for the sub-projects and develop and finalize E&S documents for each sub-project. These tasks are conducted before the commencement of project activities.

DSI Consultant will be responsible for the design, supply, and installation of solar power plant and also in charge of complying with all environmental and social mitigation measures, requirements, and procedures, and for the implementation of the respective sub-project specific ESMPs/ESMP Checklist, SEP, and OHS Plan. The preparation of the site-specific sub-management plans depending on the sub-project requirements and site-specific Labor Management Plan ("LMP") is the responsibility of the DSI consultant. All DSI Consultants in charge of carrying out specific sub-project activities will also be required to implement the relevant provisions of this sub-project SEP.

The Supervision Consultant will be responsible for auditing, monitoring, and reporting on the sub-project implementation at a regional level. The grievance mechanism requirements will be the responsibility of the Supervision Consultants.

PUMREP Environmental and Social Management Framework Table 7 provides details of roles and responsibilities for the PUMREP E&S implementation where the Framework is available on PUMREP website (<https://kamuenerji.csb.gov.tr/kayep-projesi-i-110689>).

8 Grievances Mechanism

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

To achieve transparency and accountability and meet the related standards of WB, GM will be established for the PUMREP and each sub-project and implemented during the project life cycle.

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

The mechanism focuses not only on receiving and recording complaints but also on resolving them. All grievances/concerns/suggestions should be registered and follow the basic procedures set out in this section.

Within the scope of PUMREP, grievances/concerns/suggestions will be handled at multiple levels:

- 1) DSI Consultant level,
- 2) Supervision Consultant level,
- 3) PDoEUCC level, and
- 4) National level through MoEUCC PUMPREP PIU.

DSI Consultant: Each DSI consultant will be responsible for supplying grievance boxes, installing them in each building, designing and printing posters and brochures about the grievance mechanism and the sub-project, registering grievances/concerns/suggestions by filling out the Grievance and Suggestion Form and Close-out Form (provided in Appendix-1: Grievance and Suggestion Form and Appendix-2: Grievance and Suggestion Close-out Form respectively), taking necessary actions to address the grievances/concerns/suggestions, sending the records to the Supervision Consultant and PIU on a weekly basis. The DSI Consultant is also responsible for setting up a workers’ GM for its project workers which will be detailed in Section 8.1.

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 PUMREP. 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 PUMREP PIU on a monthly basis. The Supervision Consultant is also responsible for setting up a workers’ GM for its project workers which will be detailed in Section 8.1.

PDoEUCC: Each PDoEUCC will be responsible for taking the necessary measures to address received grievance/concern/suggestions regarding the activities carried out within the scope of the PUMREP in their region to the extent possible. The PDoEUCC is obliged to send the record of the grievance/concern/suggestions to the PUMREP PIU on monthly basis. The PDoEUCC responsible for supervision works will also be responsible for the implementation of the GM.

MoEUCC PUMPREP PIU: Within the scope of PUMREP, PUMPREP PIU 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. PUMPREP PIU is responsible for resolving the collected grievance/concern/suggestion within 30 days and informing the owner of the grievance/concern/suggestion about the result. Records of the grievance/concern/suggestion will be shared with WB through Monitoring Reports regularly. 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 PUMREP. All complaints/opinions/suggestions coming to ALO181 will be directed to PUMREP PIU by the call center officers.

The GDCA in MoEUCC operates a website (<https://kamuenerji.csb.gov.tr/>) for PUMREP where all relevant information is being disclosed for public opinion and review. Through the complaint submissions section that is available on the website or e-mail address (yigmenerji@csb.gov.tr), the PIU will be able to collect grievances from all stakeholders. The principle of confidentiality and the right to make anonymous complaints will be ensured. The details of the communication channels are given below:

E-mail: yigmenerji@csb.gov.tr
Website: www.kamuenerji.csb.gov.tr
MoEUCC Call Center: ALO181

Foreigners Communication Center ("YİMER")
Online application through website: <https://www.yimer.gov.tr/>
Hotline: 157

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 through website: <https://www.cimer.gov.tr/>
Online application through 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

The following timeframe will be used by the DSI Consultant, Supervision Consultant, PDoEUCC and PUMREP PIU:

Written acknowledgement of receipt of the grievance: within 2 days of receiving the grievance.

Resolution for the grievance: within 15 days of receiving the grievance.

Nominated and trained members of staff will record grievance information in a Grievance and Suggestion Log (see Appendix-3: Grievance and Suggestion Log and Section 8.2).

The Grievance and Suggestion Form (See Appendix-1: Grievance and Suggestion Form) will be revealed on the:

- Websites of the PUMREP operating by GDCA and/or relevant government authorities, where the sub-project activities will be implemented, and
- Printed copies in the premises of the public buildings where the sub-project will take place, when the construction work activities will start and the premises of the local communities, located near the sub-project area.

Any grievance/concern/suggestion can be brought to the attention of the DSI Consultants verbally or in writing (by post or e-mail) or by filling in Grievance and Suggestion Form. Grievance and Suggestion Forms will be made available in the sub-project areas that are easily accessible for all relevant stakeholders.

All grievance/concern/suggestion will be verified by the Supervision Consultant in the Grievance and Suggestion Log, assigned a number and addressed within 30 calendar days. The Grievance and Suggestion 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 log 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) dates of resolution, closure and provision of feedback to the complainant.

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

If the responsible party is not able to address the issues 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 a situation when the responsible party is not able to address the particular issue or if action is not required, PIU will provide a detailed explanation/justification to the complainant on why the issue is 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.

A separate grievance mechanism will be available for the workers (See Section 8.1), 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. Building awareness on gender-based violence and abuse in the workplace for female workers (both at the construction site and in the buildings under the project) and establishing a GM hotline for such issues will be emphasized. There will also be awareness raising discussions with both men and women regarding appropriate workplace 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 WB's Grievance Redress Service (See <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>). Grievance Redress Service 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 WB Independent Inspection Panel. 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, the WB would have an opportunity to respond to the complaints.

8.1 Workers' Grievance Mechanism

The Supervision Consultant and DSI Consultant will develop and implement a GM for their workforce including subcontractors, prior to the start of work. The workers' GM will include:

- (i) A procedure describing the flow of the workers' 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.

This GM 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.

The Supervision Consultant and DSI Consultant 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 PIU. PUMREP PIU will also record and resolve the grievances of its employees and compile all data gathered from different levels (Supervision Consultant and DSI Consultant) in a central log. The PIU will also be responsible for managing GM and responding to grievances and complaints received in the scope of the PUMREP.

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 training, which will be provided to all project workers.

The workers' GM will not prevent project workers from using other judicial or administrative remedies available under the law.

In addition, the workers' GM as well as PUMREP GM will include a channel to receive and address confidential complaints related with Sexual Exploitation, Abuse/Sexual Harassment with special measures in place.

8.2 Grievance and Suggestion Log

The Supervision Consultant 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 project affected people, his/her location and details of his/her complaint,
- Date of reporting by the complainant,
- Date when the Grievance 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.

An indicative Grievance and Suggestion Log is given in Appendix-3: Grievance and Suggestion Log.

8.3 Monitoring and Reporting on Grievances

Monitoring and evaluation of the stakeholder engagement and grievance management 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.

Supervision Consultant 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 ESS2 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.

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

9 Disclosure of Environmental and Social Documents and Engagement Meeting

This section is reserved to be prepared after the stakeholder engagement meeting, including information regarding the publication of the E&S documents regarding the sub-project to the stakeholders and information about the first stakeholder participation meeting to be held.

Appendix-1: Grievance and Suggestion Form

Grievance and Suggestion Form	
Reference No	
Full Name (Not mandatory, you can submit anonymously) *	
Please mark how you wish to be contacted and provide your mail, telephone, e-mail.	
Province/District/Neighborhood	
Name of the Project	
Date	
Category of Grievance	
1. On abandonment (public)	
2. On assets/properties affected by the Project	
3. On infrastructure	
4. On decrease of complete loss of income	
5. On environmental issues (eg. Pollution)	
6. On employment	
7. On traffic, transportation and other risks	
8. Other (Please specify.) (If private, contact Project Implementation Unit directly.)	
Description of the Grievance <i>(What did happen? When did it happen? Where did it happen? What is the result of the problem?)</i>	
What would you like to see happen to resolve the problem?	
<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:

Appendix-2: Grievance and Suggestion Close-out Form

Grievance and Suggestion Close-out Form	
Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	<input type="checkbox"/> YES <input type="checkbox"/> NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
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 out and signed by the complainant after s/he receives the compensation fees and/or his/her complaint has been remediated.

Notes:.....

Complainant's:

[Name-Surname and Signature]

Date: / /

Representative of the Responsible Institution/Company:

[Title-Name-Surname and Signature]

Date: / /

Appendix-3: Grievance and Suggestion 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, MoEUC Provincial Directorate Level, PIU Level, Ministerial Level, etc.)	Level of Grievance (contractor, supervision consultant, provincial directorates, Ministry, Alo 181, etc.)	Name and Surname of the Complainant	Gender of the Complainant	Complainant's E-mail	Complainant's Phone Number	Province 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
1																				
2																				
3																				