

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

**ÜMRANİYE MUNICIPALITY
13.728 kWp/ 11.221 kWe
SOLAR POWER PLANT PROJECT**

STAKEHOLDER ENGAGEMENT PLAN

SEPTEMBER 2025

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LIST OF ABBREVIATIONS

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

REVISION HISTORY

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EXECUTIVE SUMMARY

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

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

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

The subproject to be financed under PUMREP includes the installation of a renewable energy facility with a total installed capacity of 13.728 kWp/11.221 kWe and expected to generate total 21.800.064 kWh/year of electricity annually by Ümraniye Municipality. Solar Power Plant (SPP) Projects of Ümraniye Municipality (sub-project) are planned to be realized in lot 10 of block 626, Camikebir Neighborhood, Maden district, Elazığ province. Lot 10 of block 626 is Treasury Finance land and is 883.302,79 m². With the official letter dated 14.07.2023 and numbered 6887050 of the General Directorate of National Real Estate of the Ministry of Environment, Urbanisation and Climate Change, the easement right of 171,777.19 m² area was allocated to Ümraniye Municipality for 29 years. Although Ümraniye Municipality is the owner and implementing institution of the Solar Power Plant (SPP) Project, the sub-project will be physically carried out within the administrative boundaries of Maden District, Elazığ Province. Therefore, stakeholder engagement activities (public consultations, information disclosure and local meetings) will primarily be organized in Maden district to ensure that local communities are adequately informed and consulted. Similarly, the grievance mechanism will be accessible both through Ümraniye Municipality and through locally established channels in Maden (e.g. municipal liaison, mukhtar's office, dedicated phone line), ensuring that grievances can be received, addressed, and reported in line with ILBANK's and the World Bank's standards.

During the construction phase, a total of 20 workers (including contractors and subcontractors) will work on site during the peak period and no campsite will be set up on site for these workers. However, mobile toilets and a resting area will be provided for the workers.

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

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

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

1. INTRODUCTION/PROJECT DESCRIPTION

1.1. Objectives

PUMREP aims to support the Government of Türkiye to scale-up RE use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed RE market in public facilities and help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security. Ümraniye Municipality is one of the sub-borrowers and has a sub-project financed under PUMREP. Therefore, this plan is prepared in line with PUMREP's Stakeholder Engagement Plan which is a framework document in order to define the stakeholder engagement process including the grievance mechanism.

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

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

This SEP of Ümraniye Municipality is an action plan which was prepared for Ümraniye Municipality 13.728 kWp/11.221 kWe Solar (Photovoltaic) Power Plant sub-project and sets out methods for effective communication and interaction with stakeholders.

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

1.2. Components

The sub-project includes the installation of 13.728 kWp/11.221 kWe Solar (Photovoltaic) Power Plant and 6,3 km energy transmission line (ETL).

The Energy Transmission Line (ETL) will be connected to the new Mining Energy DC Center, which will be constructed by taking 6,408.86 meters of overhead line from the Ümraniye Municipality Solar Power Plant Transformer Center. The new Mining Energy DC Center will be constructed immediately in front of the existing Mining Energy DC Center. The ETL will be overhead and will pass through the Treasury, forests, pastures, and unlicensed lands along its route. Additionally, the Ordu Küme Evler Street and Sivrik Kullan Bahçeleri Küme Evler cadastral road will be used in some locations. Private third-party lands will not be used. Applications for allocation permits have been submitted for publicly owned parcels (Treasury, forests, pastures, etc.) and unregistered lands. Because these parcels are treasury lands, the TEDAŞ Board of Directors, as the authorized institution, has decided, in its decision numbered 69-1324, dated July 22, 2025, that TEDAŞ will carry out the relevant work and procedures. The list of poles along the ETL route is given in Table 2.

1.3. Location

The subproject is planned on lot 10 of block 626 in Camikebir Neighborhood, Maden District of Elazığ Province. Lot 10 of block 626 is Treasury Finance land and is 883.302,79 m². With the official letter dated 14.07.2023 and numbered 6887050 of the General Directorate of National Real Estate of the Ministry of Environment, Urbanisation and Climate Change, the easement right of 171,777.19 m² area was allocated to Ümraniye Municipality for 29 years. Information on the sub-project location is presented in Table 1.

Table 1. Location of Sub-project

Province	Distirt	Neighborhood/ Neighborhood	Block	Lot
Elazığ	Maden	Camikebir	626	10

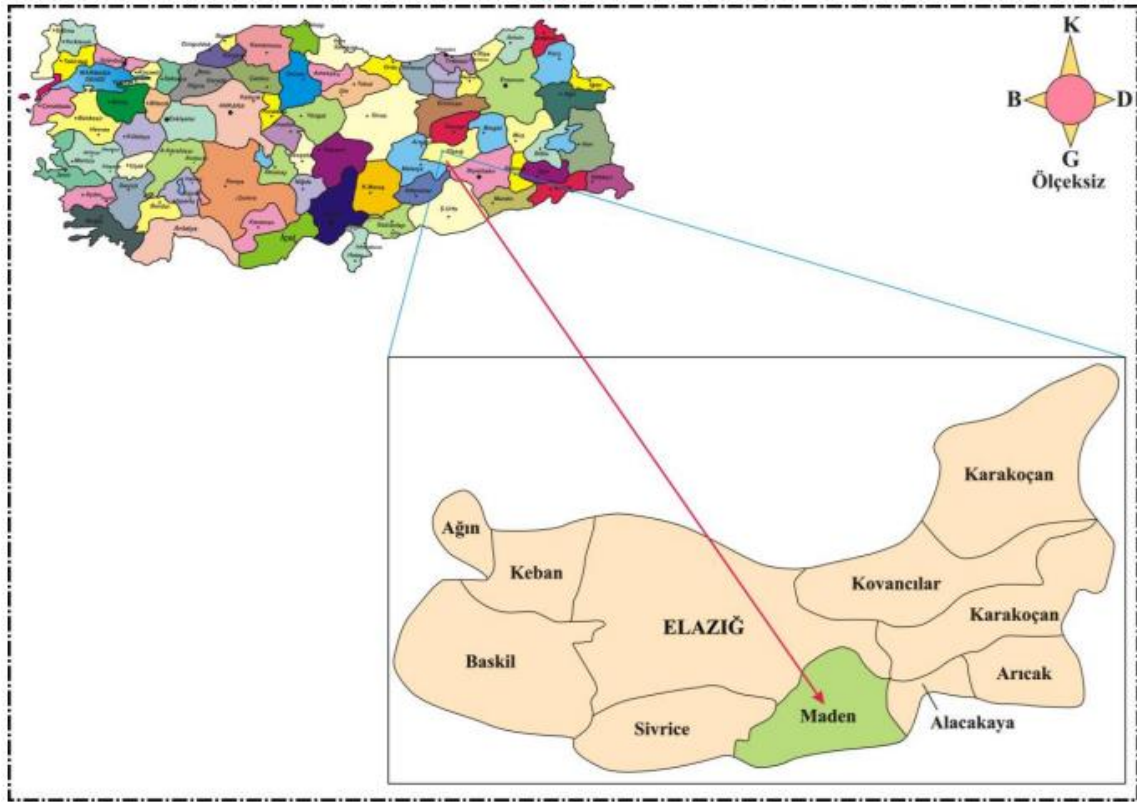


Figure 1. Location of Sub-project

The ETL will be connected to the new Mining Energy DC Center, which will be constructed by taking 6,408.86 meters of overhead line from the Ümraniye Municipality Solar Power Plant Transformer Center. The new Mining Energy DC Center will be constructed immediately in front of the existing Mining Energy DC Center. The ETL will be overhead and will pass through the Treasury, forests, pastures, and unlicensed lands along its route. Additionally, the Ordu Küme Evler Street and Sivrik Kullan Bahçeleri Küme Evler cadastral road will be used in some locations. Private third-party lands will not be used. Applications for allocation permits have been submitted for publicly owned parcels (Treasury, forests, pastures, etc.) and unregistered lands. Because these parcels are treasury lands, the TEDAŞ Board of Directors, as the authorized institution, has decided, in its decision numbered 69-1324, dated July 22, 2025, that TEDAŞ will carry out the relevant work and procedures. Privately owned land will not be used, and no informal land users are present.(See Figure 2).

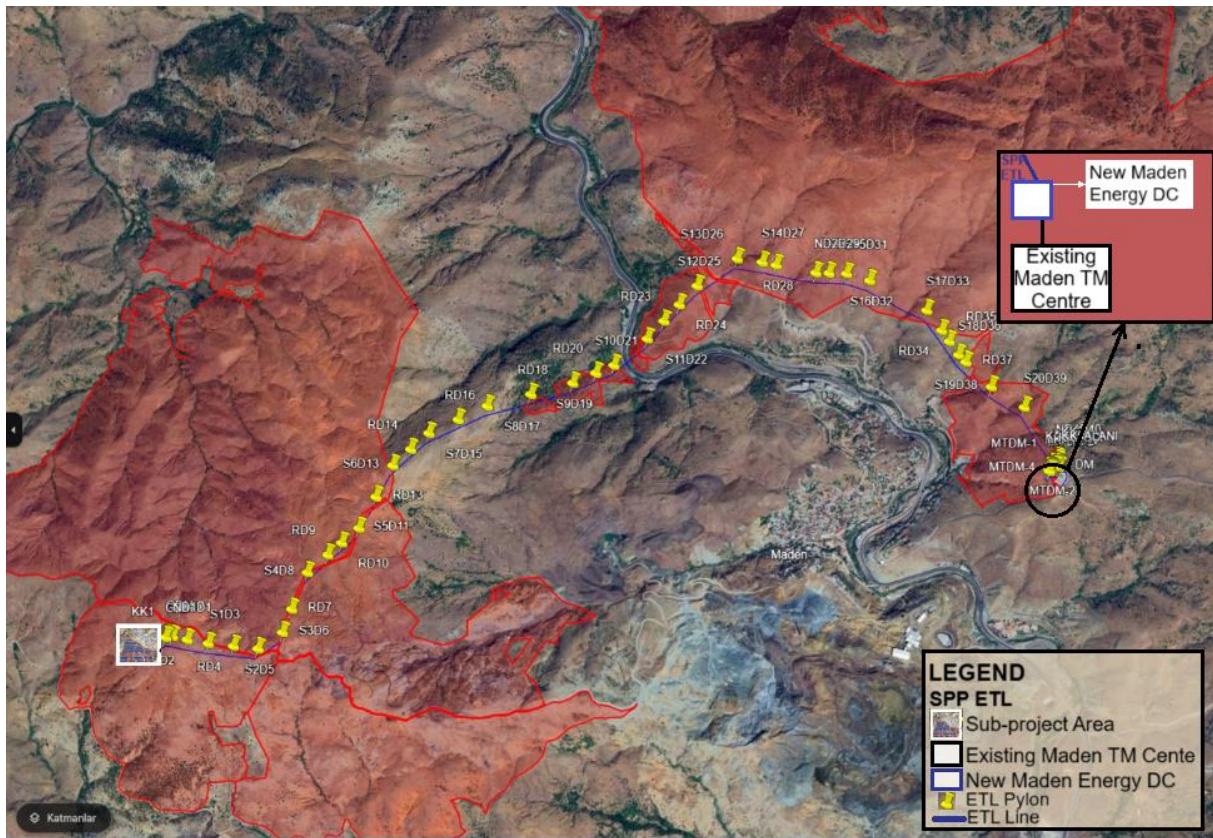


Figure 2. Map of ETL Route

Maden-Diyarbakır motorway will be used for access to the site. Access to the SPP Facility will be provided from Ordu Küme Evler street and Sivrik Kullan Bahçeleri Küme Evler cadastral road. The road in question is a stabilised dirt road. The road is a smooth road suitable for the passage of panel loaded trucks and construction equipment. This road reaches to the SPP site. The access route is shown in the Figure 3. There will be no land acquisition for the access road.

Table 2.Poles and Parcel Information on the ETL Route

ÜMRANIYE MUNICIPALITY SPP ETL PYLON POINTS						
POLE	PROVINCE	DISTRICT	NEIGHBORHOOD	BLOCK	LOT	QUALIFICATION
ND1	ELAZIĞ	MADEN	CAMİLKEBİR	626	10	TREASURE

2	ELAZIĞ	MADEN	CAMİKEBİR	626	10	TREASURE
3	ELAZIĞ	MADEN	CAMİKEBİR	626	10	TREASURE
4	ELAZIĞ	MADEN	CAMİKEBİR	626	10	TREASURE
5	ELAZIĞ	MADEN	CAMİKEBİR	626	10	TREASURE
6	ELAZIĞ	MADEN	CAMİKEBİR	629	108	TREASURE
7	ELAZIĞ	MADEN	CAMİKEBİR	629	108	TREASURE
8	ELAZIĞ	MADEN	CAMİKEBİR	629	108	TREASURE
9	ELAZIĞ	MADEN	CAMİKEBİR	629	108	TREASURE
10	ELAZIĞ	MADEN	DUTPINARI	180	21	PASTURE
11	ELAZIĞ	MADEN	CAMİKEBİR	629	108	TREASURE
12	ELAZIĞ	MADEN	CAMİKEBİR	629	108	TREASURE
13	ELAZIĞ	MADEN	DUTPINARI	180	21	PASTURE
14	ELAZIĞ	MADEN	DUTPINARI	-	-	EXCEPT REGISTRATION
15	ELAZIĞ	MADEN	DUTPINARI	-	-	EXCEPT REGISTRATION
16	ELAZIĞ	MADEN	DUTPINARI	-	-	EXCEPT REGISTRATION
17	ELAZIĞ	MADEN	DUTPINARI	-	-	EXCEPT REGISTRATION
18	ELAZIĞ	MADEN	CAMİKEBİR	629	40	FOREST
19	ELAZIĞ	MADEN	CAMİKEBİR	629	39	FOREST
20	ELAZIĞ	MADEN	CAMİKEBİR	629	39	FOREST
21	ELAZIĞ	MADEN	CAMİKEBİR	629	146	FOREST
22	ELAZIĞ	MADEN	BAHÇELİEVLER	641	2	TREASURE
23	ELAZIĞ	MADEN	BAHÇELİEVLER	641	2	TREASURE
24	ELAZIĞ	MADEN	BAHÇELİEVLER	641	2	TREASURE
25	ELAZIĞ	MADEN	BAHÇELİEVLER	641	2	TREASURE
26	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
27	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
28	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
29	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
30	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
31	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
32	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
33	ELAZIĞ	MADEN	KARATOP	102	2	FOREST
34	ELAZIĞ	MADEN	KARATOP	-	-	EXCEPT REGISTRATION
35	ELAZIĞ	MADEN	KARATOP	-	-	EXCEPT REGISTRATION
36	ELAZIĞ	MADEN	KARATOP	-	-	EXCEPT REGISTRATION
37	ELAZIĞ	MADEN	KARATOP	-	-	EXCEPT REGISTRATION
38	ELAZIĞ	MADEN	BAHÇELİEVLER	683	71	TREASURE
39	ELAZIĞ	MADEN	BAHÇELİEVLER	683	71	TREASURE
40	ELAZIĞ	MADEN	BAHÇELİEVLER	683	71	TREASURE



Figure 3. Sub-project Sites Access Route

1.4. Area of Influence

According to WB ESS1, “where the project specifically identifies physical elements, issues and facilities that are likely to have an impact, the environmental and social risks and impacts will be identified in the context of the subproject’s Area of Influence (Aol)”.

While determining the environmental and social impacts originating from the sub-project, the Impact Area of the sub-project has been taken into consideration. In the calculation of environmental and social risks and impacts, for precautionary purposes, the environmental impacts (noise, emissions, traffic, etc.) in the settlement areas around the sub-project site and the areas where the ETL passes have been determined as the impact area. The satellite image of the nearest settlement and the distances to the sub-project site are given in the figure below (See Figure 4).

The closest residential area to the sub-project area is Camikebir District, 2.8 km away. ETL passes outside the residential areas.

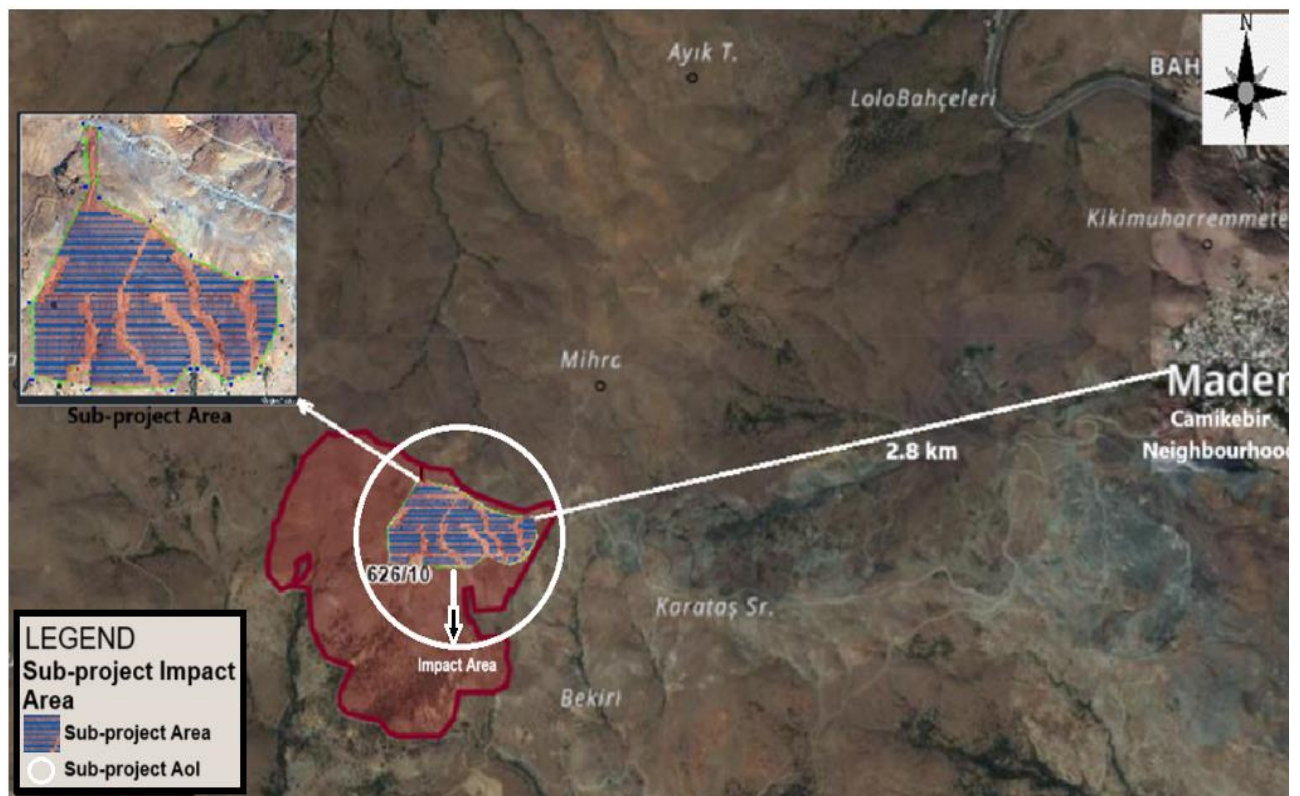


Figure 4.Sub-project Impact Area

2. OBJECTIVE/ DESCRIPTION OF SEP

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

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

- Helping Ümraniye Municipality identify stakeholders, and build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties,
- Assessing the level of stakeholder interest and support for the subproject and to enable stakeholders' views to be taken into account in subproject design and environmental and social (E&S) performance,
- Promoting and providing means for effective and inclusive engagement with subproject affected parties throughout the subproject life cycle on issues that could potentially create an impact,
- Ensuring that technically and culturally appropriate subproject information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format,
- The Ümraniye Municipality is responsible for providing project-affected parties with accessible and inclusive means to raise issues and complaints. Because the subproject is located within the Maden district, the responsible Ümraniye Municipality has established coordination with the Maden Municipality. The Maden Municipality is aware of its roles and responsibilities regarding managing environmental and social risks and impacts, receiving and responding to complaints, and managing them,
- Defining a consultation approach for stakeholders regarding the construction and operation phases of the sub-project, establish and maintain constructive relationships with the local community and other relevant stakeholders.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

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

3.1. Methodology

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

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

Within the scope of this SEP, on 24.04.2025, social expert of the consultant company, made a sit visit and made consultations with mukhtar and residents of Camikebir Neighborhood.

For the subproject, the following stakeholders have been identified and analyzed per project component. These stakeholders include affected parties, other interested parties and disadvantaged/vulnerable individuals or groups.

3.2. Project affected parties

The term "project affected parties" includes those likely to be affected by the subproject because of actual impacts or potential risks to their physical environment, health, security,

cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities. Specifically, the following individuals and groups fall within this category:

- Residents of Camikebir Neighbourhood (According to field visit findings and TurkSTAT data for 2024, the population of Camikebir Neighborhood is 2,025 people (TurkSTAT 2024). Of this population, 1,054 are male and 971 are female)
- Persons who will work within the scope of the subproject

3.3. Other Interested Parties

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

3.3. Disadvantaged/ vulnerable individuals or groups

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

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

➤ Households with low or no income:

- Individuals experiencing financial hardship may struggle to maintain their livelihoods due to the project's negative social and environmental impacts. They may be concerned about their livelihoods. Because these segments have difficulty accessing alternative income sources, even small losses can lead to serious financial hardship. Families that engage in livestock farming or small-scale agricultural activities in particular can find it difficult to access resources. Individuals in low-income households may not be able to access these job opportunities when seeking skilled labor. Individuals receiving state poverty pensions, those with low incomes below the minimum wage, or those with no income at all may have difficulty communicating their complaints, concerns, or opinions due to financial hardship, such as being unable to cover transportation costs or accessing grievance mechanisms. They may also have difficulty accessing activities.

In the Camikebir neighborhood, there are 268 household representatives receiving state poverty pensions, those with low incomes below the minimum wage, or those with no income at all.

➤ **Households with family members with physical and/or mental disabilities:**

- construction activities may disrupt accessibility routes or facilities, limiting mobility and causing inconvenience. There are 13 households with physical and mental disabilities in Camikebir neighborhood.

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

- construction activities may disrupt daily routines and access to essential services for the elderly, potentially causing inconvenience or stress. The number of elderly people over the age of 70 who live alone and need care in Camikebir neighborhood is 10 resident.

During the field visit, it was determined that there was no one in Camikebir neighborhood who did not speak Turkish. It was also determined that there were no patients with chronic diseases requiring constant medical care or individuals in need of care.

The characteristics of disadvantaged and vulnerable individuals in Table 3 include those who experience restrictions in their access to development opportunities, often for economic, social or physical reasons. These groups/individuals often experience poor well-being, limited access to health services and lack of education and employment opportunities. The lack of social support systems and being at risk of discrimination also increase the vulnerability of these groups.

In the interviews with Camikebir neighborhood mukhtar, Camikebir neighborhood residents, there are no refugees or migrants among those affected by the sub-project or living in Camikebir neighborhood. In addition, there are no child or female-headed households. There are 66 households (170 individuals) living on social assistance from the state and associations and 41 unemployed households (98 individuals). According to the above data, Vulnerable/Disadvantaged Groups consist of 291 people.

Priority will be given to local people in recruitment within the scope of the sub-project. According to the information received from the Camikebir Neighborhood Mukhtar's Office, which is the closest settlement to the sub-project area, the information of vulnerable and/or individuals and/or disadvantaged groups is given in the Table 3.

Table 3. Vulnerable and disadvantaged groups in Camikebir Neighborhood

Vulnerable and Disadvantage Groups/ individuals	Number of People
Households with family members with physical and/or mental disabilities	13
Elderly people over 70 living alone and in need of care	10
Individuals with low or no income	268
Total Vulnerable and Disadvantage Individuals/Groups	291

Source: Mukhtar Meetings.

Table 4. Influence/Interest Table for stakeholder prioritization

Stakeholder Groups			Level of Interest	Level of Impact
Project Affected Parties	Workforce	Workers to be employed during the construction phase (including subcontractors and third parties' workers)	High	High
	Residents living within the boundaries of the nearest settlement but outside the AoI	Households in Camikebir neighborhood	Moderate	Moderate
Vulnerable/disadvantaged individuals/groups	Vulnerable/disadvantaged individuals/groups living within the nearest settlement	Households with family members with physical and/or mental disabilities Elderly people over 70 living alone and in need of care Households with low or no income	Moderate	High
Other Interested Parties(OIP)		Maden District Agriculture and Forestry Directorate Elazığ Provincial Directorate of Environment, Urbanization and Climate Change Elazığ Provincial Directorate of Culture and Tourism Maden District Social Assistance and Solidarity Foundation Maden Municipality Zoning Affairs Director	Low	Low

4. STAKEHOLDER ENGAGEMENT PROGRAM

4.1. Summary of stakeholder engagement done during project preparation

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

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

Stakeholder engagement will continue to utilize already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Sub-Project. The Sub-Project has utilized and will continue to use the following methods for interacting with stakeholders:

- **Informal/formal face-to-face or online meetings** with affected communities and other stakeholders –can be the main form of consultation throughout the lifetime of the Sub-Project. Stakeholders will be informed about these consultation meetings by telephone, brochures, announcements (posted on noticeboards, advertised in the newspapers, etc.), posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties ten (10) days in advance.
- **Focus group meetings** with affected communities and other stakeholders and sensitive receptors (i.e. hospitals, schools, mosques) – can be a form of engagement that will support consultations throughout the life of the Sub-Project. It will also provide a suitable environment for stakeholders to express their views.
- **Ümraniye Municipality's website:** A collaboration mechanism will be established between the Ümraniye Municipality and Maden Municipality, encompassing grievance, announcement, information, and stakeholder engagement activities. Both municipalities' websites will be used to disseminate information such as announcements, documents, reports, and other information related to subproject activities. The ESMP and SEP prepared for the subproject will be published in English and Turkish on the Ümraniye and Maden Municipality websites. Information regarding the implementation of the grievance mechanism established by the Ümraniye and Maden Municipalities will be posted on the website, along with the contact information of the General Directorate responsible. All current information regarding the subproject will be available to the public through both municipalities' websites..
- **Written materials:** Handbooks, banners, brochures, leaflets, posters, informative booklets, etc. to enable stakeholders to learn about the Sub-Project and this stakeholder engagement plan.
- **Grievance mechanism** will be open for access by the public.
- **Media promotions:** Throughout the life of the sub-project, information disclosure and contact information will be promoted through local and national newspapers and the social media accounts of the Ümraniye Municipality.

On 24.04.2025, the social expert of the consulting company conducted on-site inspection and consultations. Consultations were held with the parties affected by the project and other relevant parties, stakeholders, institutions and organizations specified below and the member of the Maden District Social Assistance and Solidarity Foundation Association;

- Mukhtar of Camikebir Neighborhood,
- Residents of Camikebir Neighborhood (10 household representative)
- Ümraniye Municipality Environment and Zero Waste Manager and sub-project manager staff
- Maden Municipality Zoning Affairs Director
- Elazığ Provincial Directorate of Environment, Urbanization and Climate Change Environmental Engineer,
- Maden District Agriculture and Forestry Directorate Forest Engineer
- Elazığ Provincial Directorate of Culture and Tourism Public Relations and Promotional Activities Social Expert
- Maden District Social Assistance and Solidarity Foundation Association,

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

Within the scope of the interviews;

- It has been understood that the parties affected by the subproject and other relevant parties have sufficient information about the SPP.
- The subproject area has not been used for commercial purposes, agricultural activities or animal husbandry (animal shelter, grazing, pasture, etc.) before. It has been determined that it is not currently used for any purpose by the municipality, institution, organization or local people.
- The Maden district, located in a mountainous region, has gained importance due to its copper deposits. The Ergani Copper Mine, which began production in Maden in 1939, produced copper using modern methods and brought the Maden district some of its most prosperous years in history. However, due to the decline in copper mine activity, the unemployment rate in Maden has increased. Individuals experiencing financial hardship due to unemployment may struggle to access livelihoods due to the negative social and environmental impacts of the subproject. Participation in the stakeholder

engagement process may be difficult, particularly because they cannot afford transportation costs due to increased unemployment. They may also have difficulty communicating their complaints, concerns, or opinions about the subproject. Facilities such as free transportation support will facilitate participation in stakeholder engagement meetings and consultations. The feedback obtained will ensure that impacts and risks are mitigated.

- Due to the recent agricultural and livestock policies and economic losses, production has decreased and 10% of the population has migrated to Elazığ Center to find work. 7% of Camikebir's population continues to work in copper mines. 10% of Camikebir's population is a public servant. There are 420 retirees. There are 68 households engaged in agricultural activities in the Bermaz Plain and 5 households engaged in animal husbandry in mountainous areas. According to 2024 data from the Turkish Employment Agency (İŞKUR), the number of registered unemployed people in Camikebir Neighborhood is 98. Thanks to the subproject's employment support in the region, the unemployment rate will decrease and return migration will be facilitated.

Table 5 presents stakeholders needs within the scope of the sub-project.

Table 5. Identification of Stakeholders and their Needs

Affected Party	Other Interested Party	Community	Stakeholder Group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, childcare, daytime meetings)
√		Municipality	• Ümraniye Municipality	Implementation of the subproject	Turkish	Written information, phone, e-mail, face to face	Ensure the implementation of the subproject
√		Camikebir Neighborhood	• Camikebir Neighborhood's residents	Target group of the sub-project	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases
√		Vulnerable/ Disadvantaged Groups	• Households with family members with physical and/or mental disabilities • Elderly people over 70 living alone and in need of care • Households with low or no income	Individuals with the potential to be more affected by the project activities (especially construction works)	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases

	√	Government / Authorities	• Maden District Agriculture and Forestry Directorate • Elazığ Provincial Directorate of Environment, Urbanization and Climate Change • Elazığ Provincial Directorate of Culture and Tourism • Maden District Social Assistance and Solidarity Foundation	Representing the state side of the project to be realized on behalf of the public	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases
	√	NGO	• Maden District Social Assistance and Solidarity Foundation	Creating public opinion on the environmental and social impacts of the subproject	Turkish	Written information, phone, e-mail, face to face	Be aware of subproject phases

4.3. Stakeholder engagement plan

The main goals of the stakeholder engagement program are to inform, disclose and consult on various project documents and activities early on to establish a dialogue with project stakeholders from project planning through implementation and operation. The first Stakeholder Consultation Meeting (SCM) of the sub-project will be held following the approved by İLBANK draft ESMP report in an appropriate venue located close to the sub-project site which will have sufficient capacity and facilities, thus facilitating comfortable and efficient communication. Above mentioned PAPs and OIPs will be invited to the SCM.

Prior to the SCMs, announcements will be published in local and national newspapers, and on Ümraniye Municipality's official website. Sub project information brochures will be distributed 10 days prior to the meeting to the participants before the meetings begin and sub-project maps will be made available in the brochures and in public places like village tea houses, mukhtars' offices. Not only will announcements be made through official means, but also the involvement of the local people will be encouraged by contacting the mukhtars prior to the meeting in order to encourage them about the meeting and the subproject.

In addition to official announcements, local participation will be encouraged by the Social Expert of PIU through direct engagement with community leaders. To ensure the inclusion of vulnerable groups such as seasonal migrants and Syrian refugees, local leaders will be consulted in the field. Neighborhood visits will be carried out according to the construction activities calendar. Mukhtar(s) and local people will be informed in detail about the project and the grievance mechanism within the sub-project through consultation meetings.

Consultation meetings will begin with an introduction and an explanation of the purpose and scope of the meeting, and followed by a final discussion session where questions, concerns and suggestions were taken after the presentations made by Ümraniye Municipality.

The main topics which will be covered in the presentations are as follows:

- Aim and the coverage of the sub-project.
- Who are the Project Main Executive Body, Project Beneficiary and Executing Organization and Project Sponsors?
- What are the expected benefits of the Project?
- What are Environmental and Social Negative Impacts? An overview of the anticipated environmental and social negative impacts of the sub project and the measures suggested to mitigate these (participants will be invited to discuss any additional negative impacts they might foresee and offer views on whether the planned measures are sufficient or suggest alternative or additional measures)
- Grievance mechanism
- Discussion (Questions and Answers) Session

Consultation meetings will be conducted in a participative manner. The locals will be encouraged to express their own ideas about the subproject and their opinion in order to minimize the negative social impacts of the project. A brochure will be prepared covering those topics and will be distributed during the consultation meetings and will be distributed in public places. The brochure will include the communication information of the required contact phone numbers and email addresses and during the consultation meetings, the locals will be encouraged to contact sub project social experts.

4.4. Other methods for stakeholder engagement

Regular site visits aiming face-to-face meetings will be implemented by the contractor company social expert in order to:

Carry out grievance processes,

Further disclosure of the project,

Identifying any population change which may bring existence of any disadvantaged/vulnerable person.

Site visits can also be done with the demand of a local, while the visit of the locals to the sub project management offices can also be defined as a tool for stakeholder engagement activity.

Phone calls or text messages can be preferred according to certain circumstances but preferable meeting technique is to conduct the meetings face-to-face.

The proposed Stakeholder Engagement Program is provided in the Table 6.

Table 6. Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	1 per month	Information Statement - General information about the purpose, stages, subproject and E&S impacts/risks - Purpose, start date, duration and nature of land preparation, construction and operation activities - Preparation of mitigation management plans and procedures regarding social and environmental impacts/risks - Grievance Mechanism - Information(ESMP and SEP) on Ümraniye and Maden Municipalities websites for review	Public Consultation Meetings Face to face meetings Ümraniye and Maden Municipalities website Social Media Notice Boards Booklets etc. Posters to be hung in places such as the Camikebir Mukhtar's Office etc..	Resident of Camikebir Neighborhood, Government / Authorities,	- Supervision Consultant, - Ümraniye Municipality, - Subproject Contractor, - E&S Consultant
		Employment and Supply Strategies - Hiring employees - Staff training - Purchasing materials and services - Grievance Mechanism	Public Consultation Meeting Ümraniye and Maden Municipalities website Social Media Notice Boards Booklets etc. Posters to be hung in work areas etc.	Resident of Camikebir Neighborhood,	
Construction	1 per month	Information Statement - Monitoring targets and activities to be carried out - Monitoring targets and activities and regular reporting of monitoring results to stakeholders - Implementation of mitigation measures related to relevant social and environmental impacts/risks - Grievance Mechanism	Public Consultation Meeting Ümraniye and Maden Municipalities website Social Media Notice Boards Booklets etc. Posters to be hung in work areas etc.	Resident of Camikebir Neighborhood, Government / Authorities,	- Supervision Consultant, - Ümraniye Municipality, - Subproject Contractors, - E&S Consultant
		Traffic and Transportation Management - Road safety awareness, including safe passage through bypasses and connecting roads - Types, number and frequency of vehicles to be used during construction - Collaboration with Camikebir Neighborhood residents, muhtars and responsible authorities to improve signage, visibility and general road	Face-to-face meetings, Depending on the demands of the stakeholder group, Posters to be hung in work areas, etc., Ümraniye and Maden Municipalities website	Resident of Camikebir Neighborhood,	

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		safety, especially along roads near schools or other places where children are present, - Planning and timing of construction activities on roads, - Providing education in collaboration with Camikebir Neighborhood residents on traffic and pedestrian safety (e.g. school education campaigns)) - Traffic measures and sub-project road use sharing with mukhtar - Grievance Mechanism			
Operation	3 per month	Information Statement - Monitoring targets and activities to be carried out - Monitoring targets and activities and regular reporting of monitoring results to stakeholders - Implementation of mitigation measures related to relevant social and environmental impacts/risks - Grievance Mechanism	Stakeholder Consultation Meeting Ümraniye and Maden Municipalitys website Social Media Notice Boards Booklets etc. Posters to be hung in work areas etc.	Resident of Camikebir Neighborhood, Government / Authorities,	- Supervision Consultant, - Ümraniye Municipality, - Subproject Contractors,
		Traffic and Transportation Management - Road planning and traffic measures in operational activities, - Providing education on traffic and pedestrian safety in cooperation with the residents of Camikebir neighborhood (e.g. school education campaigns) - Grievance Mechanism	Depending on the demands of the stakeholder group, Ümraniye and Maden Municipalites websites Notice boards (in case of necessity)	Resident of Akbudak Neighborhood,	Ümraniye Municipality,
		Employment Strategies - Training of hired operational staff - Grievance Mechanism	Ümraniye and Maden Municipality website Social Media Notice Boards	Resident of Camikebir Neighborhood,	Ümraniye Municipality,

Ümraniye Municipality will make sub-project E&S documents available on its website in both Turkish and English. These documents will also be accessible at Ümraniye Municipality and Maden District Municipality. In addition, sub-project posters and information on the grievance mechanism will be displayed at local points, including Camikebir Neighborhood Mukhtar's Office. Stakeholder consultations will be conducted to review draft E&S documents before they are finalized and disclosed. This process will ensure that stakeholders' views and concerns are valued and integrated, promoting a more effective and inclusive outcome.

4.4. Reporting back to stakeholders

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

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

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

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

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

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

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

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

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

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

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

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

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

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

During the construction phase, voice announcements will be made by Ümraniye Municipality and/or Contractors two (2) days in advance for road restrictions, water cuts and other infrastructure service limitations. Environmental and social performance indicators will be shared with stakeholders monthly via Ümraniye Municipality's website¹.

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

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

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

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

¹ <https://www.umraniye.bel.tr/>

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

PIU will be established within Ümraniye Municipality. The duties and responsibilities of PIU are explained in Table 7.

Company/ Institution	Profession/ Expertise
Ümraniye Municipality	2 Environmental Experts
Ümraniye Municipality	OHS Expert
Ümraniye Municipality	Social Expert
Ümraniye Municipality	Human Resource Expert

5.2. Resources

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

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

5.3. Management functions and responsibilities

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

Ümraniye Municipality/PIU will be responsible for the execution of the stakeholder engagement activity. Detailed roles and responsibilities for stakeholder participation in the subproject are provided in Table 7.

Table 7.Responsibilities

Responsible Party	Roles and Responsibilities
Ümraniye Municipality(PIU)	• Implementation of this SEP, • Planning and implementing SEP activities in close cooperation with ILBANK PMU, • Reporting Ümraniye Municipality's SEP-related activities to ILBANK Board of Directors, • Accessing PAPs/stakeholders for site-specific sub-project issues, • Reporting to ILBANK PMU on the implementation of SEP activities, • Proper implementation of the grievance mechanism defined in the SEP, and • Informing ILBANK PMU on the general status of implementation.
Ümraniye Municipality(GMCP)	• Leading stakeholder engagement activities in close collaboration with the ILBANK PMU, • Act as a focal point for the GM in the PIU, • Keep records and monitor sub-project-related grievances, • Manage and coordinate the resolution process of sub-project related grievances, • Review grievance records for relevant non-compliance issues or recurring issues related to stakeholder engagement and other sub-project activities, • Coordinate and monitor PIU contacts at the contractor level, • Inform PIU and management about the resolution process, • Prepare compiled PIU reports on the sub-project, • Monitor contractors' complaint records and complaint resolution process and report to PIU in monthly progress reports, • Maintain communication with PIU to respond/resolve grievances, • Consultation on specific SEP activities; • Reporting on implementation of SEP activities to ILBANK PMU, • Executing defined grievance mechanism in the SEP properly and informing ILBANK PMU about the overall implementation status.
E&S Consultant	• Providing the necessary information to Ümraniye Municipality, • Conducting an information and public participation (ESMP introduction) meeting for the public and NGOs, • Updating this SEP in line with the concerns/views of the Sub-project stakeholders and, • Finalizing the reports as per the concerns/opinions of the stakeholders.
Supervision Consultant	• Ensure that the project complies with the methodology and other requirements specified in the E&S Documents (ESMP and SEP) during the implementation of sub-projects, • Recording and monitoring the resolution of grievances from contractors and reporting them to Ümraniye Municipality (PIU) in the monthly progress reports, • Maintaining communication with PIU GM Focal Point for follow-up of complaints, • Communicating with Ümraniye Municipality (PIU) GM Focal Point for follow-up of grievances.
Contractor	• Inform Ümraniye Municipality on any issues related to engagement with stakeholders; • Transmit and resolve complaints caused by the construction activities in close collaboration with and as directed by Ümraniye Municipality; • Inform ILBANK PMU and Ümraniye Municipality on important construction activities (such as road closures and service

Responsible Party	Roles and Responsibilities
	interruptions) and of any issues related to their engagement with stakeholders; • Maintaining contact with the Ümraniye Municipality GM Focal Point for the follow up of the grievances, • Organizing and carrying out the Stakeholder Engagement/Consultation Meetings and related events regarding public information sharing, • Informing local communities of any environmental and social issues (e.g., noise, vibration, water quality monitoring, community health and safety, etc.), • Developing and implementing a grievance mechanism both for the E&S performance of the sub-project and for their workforce including sub-contractors, prior to the start of works in compliance with Ümraniye Municipality's GM requirements.

6. GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The purpose of the public grievance mechanism and the workers grievance mechanism is to provide access to a grievance resolution procedure for Subproject affected people, including communities and Subproject workers. Managing, preventing, minimizing and effectively addressing grievances is an integral part of a robust stakeholder engagement strategy. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Sub-Project worker's, local communities, and other stakeholders. Participation also helps to anticipate and review community concerns and prevent them from turning into grievances. Therefore, according to the WB, the following Grievance Mechanism (GM) will be implemented by Ümraniye Municipality/PIU throughout the life of the sub-project, including pre-construction, construction and operation phases. In the GM, comments/grievances will be received in Turkish, since everyone in the developed settlements speaks Turkish, there will be no need to use another language. The grievance channels used in applications will be published in Turkish. GM forms and consultation records will be kept in Turkish.

6.1. Grievance Mechanism at National Level

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

Presidency's Communication Centre (CIMER)²:

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

² For details please see: <https://www.cimer.gov.tr/50sorudacimer.pdf>

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

- **YIMER Website:** www.yimer.gov.tr
- **YIMER Call Centre:** 157
- **YIMER Phone Number:** +90 312 5157 11 22
- **YIMER Fax Number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/ANKARA
- **Mail addressed to Republic of Türkiye,** Directorate of Communications
- **Individual applications at the Republic of Türkiye General Directorate of Migration Management**

6.2. Sub-Project Level Grievance Mechanism

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

Ümraniye Municipality website includes a communication page, which is the mechanism where grievances/requests regarding Ümraniye Municipality activities are submitted and the resolution process is followed (Figure 5). In addition, many sections of the homepage of Ümraniye Municipality website include information about social media accounts and telephone numbers (such as the Alo 153 line) to which grievances can be submitted.

- Ümraniye Municipality's Website: <https://umraniye.bel.tr/>
- Ümraniye Municipality's E-mail address: cozummerkezi@umraniye.bel.tr
- Ümraniye Municipality's Call Centre: 153
- Ümraniye Municipality's Phone number: 444 9 822 / +90(216) 443 56 00
- Ümraniye Municipality's Address for Official Letter/Petition: Atatürk Mahallesi, Fatih Sultan Mehmet Caddesi, No: 63 PK: 34764 Ümraniye/İSTANBUL

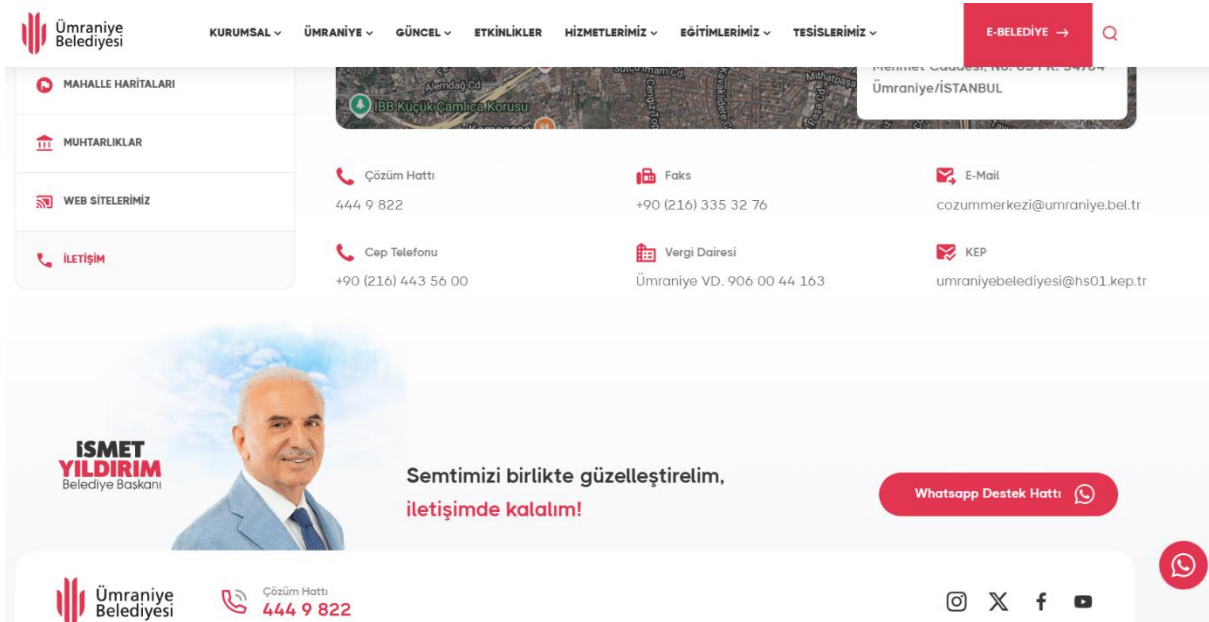


Figure 5. Ümraniye Municipality Website

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

All grievances received through direct phone calls, e-mails, face-to-face meetings/communications and the Website are recorded and after the recording process, will contact the complainant to explain the sub-project response process and the resolution of the grievance within ten (10) business days. The proposed solutions are communicated to the complainant with a second notification. If the proposed solution is accepted by the complainant, Ümraniye Municipality will handle the grievance within 15 business days and take corrective measures to resolve the grievance. A notification is required to be sent to the complainant by Grievance Mechanism Contact Person (GMCP) within two (2) business days of the receipt of the grievance, indicating that the grievance has been received and evaluated.

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

Management of Sexual Exploitation and Abuse/Sexual Harassment issues:

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

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

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

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

6.3. Grievance Mechanism for Workers

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

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

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

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

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

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

Grievance mechanism operation diagram details are given in Table 8.

Table 8. Grievance Mechanism Flow Chart

Grievance Process	Requirement / Action
Submission of a grievance	Receiving the grievance by any communication channel explained above. (At this point, if the grievance is a sensitive grievance involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2 days after receiving of the grievance. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the project sites, the grievance will be directed by the GRM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.”)
Registration of grievance	Registering/recording through making an entry in the sample grievance register table. All the grievances will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met.
Forwarding of grievance	The grievance is forwarded to relevant persons (site manager on construction sites and experts of the PIU) responsible for handling the grievance in not later than three working days upon receiving the grievance (except for any emergent grievance, which would be handled as appropriate).
Evaluation of a grievance	Evaluating the grievances within 10 working days and determining whether the grievance meets the admissibility criteria. If the grievance is not valid, providing relevant explanation to the complainant.
Response for a grievance	If the grievance is valid, identifying and taking corrective measures for resolving the grievance in not later than 15 working days upon receiving. All comments and grievances will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. At this point, it should be noted that the action taken and the result of this anonymously recorded grievance should be shared on the Ümraniye Municipality website, so that anonymous complainants is informed about their grievance and the results.
Recording the result of a grievance	Recording the result of the grievance in register table.

Grievance Process	Requirement / Action
Right to Appeal	If the grievance cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follow: • Civil Courts of First Instance • Administrative Courts • Commercial Courts of First Instance • Labor Courts, and • Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

ILBANK Grievance Mechanism

ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Project. The GM Procedures for ILBANK GM is available on its official webpage.

Below is the list of communication channels for ILBANK GM:

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

7. MONITORING AND REPORTING

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

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

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

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

Ümraniye Municipality will be responsible for making a statement through communication channels for each updated version of the SEP.

ANNEXES

Annex-A

Sample Grievance Submission Form

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

Annex-B

Sample Grievance Closure Form

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

Annex-C

Grievance Database Form

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

Annex-D

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

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

Annex-E

Sample Key Informant Interview Form (For Single Stakeholder Interviews)

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

Annex-F

Images of consultation meetings

Consultation with Camikebir Neighborhood Mukhtar



Camikebir Neighborhood People



