TURKEY PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT (PUMREP)

STAKEHOLDER ENGAGEMENT PLAN (SEP)

Kayseri Water and Sewerage Directorate's (KASKI) 2.2 KWe Solar (Photovoltaic) Power Plant Project

August 2025

Document History

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Sub-Project	Details			
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Project Owner/ Sub-borrower	Kayseri Water and Sewerage Directorate (KASKI)			
Financial Intermediary	İller Bankası A.Ş (ILBANK)			
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LIST OF ABBREVIATIONS

IA Impact Area

CIMER Presidency's Communication Centre

YIMER Foreigners Communication Centre

ESMP Environmental and Social Management Plan

ESS Environmental and Social Standard

GBV Gender Based Violence

CoC Code of Conduct

GM Grievance Mechanism

WGM Worker Grievance Mechanism

LMP Labor Management Plan

PAP Project Affected People

PIU Project Implementation Unit

ESMR Environmental and Social Monthly Report

SEA/SH Sexual Exploitation and Abuse/Sexual Harassment

SEP Stakeholder Engagement Plan

PUMREP Türkiye Public and Municipal Renewable Energy Project

SPP Solar Power Plant

RE Renewable Energy

İLBANK: İller Bankası A.Ş.

WB World Bank

KASKİ Kayseri Metropolitan Municipality General Directorate of

Water and Sewerage Administration

EXECUTIVE SUMMARY

Türkiye Public and Municipal Renewable Energy Project (PUMREP) is financed by the World Bank (WB) to support the deployment of Renewable Energy (RE) technologies in municipalities and to scale up renewable energy in the public sector. The Project aims to support developing cities identifying, preparing, financing investments that enable metropolitan municipalities to plan and invest in a sustainable future while enhancing their urban planning capacities.

Kayseri Water and Sewerage Administration (hereinafter "KASKİ") is the owner of this subproject. Within the scope of PUMREP, KASKI plans to install a land-applied Solar Power Plant (SPP) subproject called KASKİ AĞIRNAS SPP for a connection power of 2,200 kWe. To support the implementation of the subproject, İller Bankası A.Ş. (ILBANK) acts as the Financial Intermediary (FI), channeling financial resources to municipalities.

ILBANK has established an Environmental and Social Management System (ESMS) effective from 24th of Dec 2023. The ESMS is designed to align with the WB Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF. It also adheres to the environmental and social (E&S) polices and standards of other International Financial Institutions (IFIs) with which ILBANK collaborates. The ESMS will apply to all ILBANK projects and subprojects financed through International Financial Institutions (IFIs), including the KASKI AĞIRNAS SPP.

The sub-project is categorized as Moderate Risk Category as per ILBANK ESMS and World Bank's Environmental and Social Framework (WB ESF), 2018. One of the tasks under the scope of the subproject is the preparation of a Stakeholder Engagement Plan (SEP) in accordance with ILBANK ESMS, WB ESF, and the national legislation in force in Türkiye.

The principles of openness and life cycle, informed participation and feedback, inclusiveness and sensitivity, and flexibility were used to define the stakeholders of the subproject. In this way, stakeholder consultations will be conducted openly throughout the life cycle of the project, all stakeholders will be informed and their feedback will be received with appropriate tools and methods, and special attention will be paid to the participation of vulnerable individuals or groups so that all stakeholders have equal access to information.

The main objectives of this SEP are presented below;

- Identify stakeholders affected by the sub-project and establish and maintain constructive relationships with all identified stakeholders;
- Establish and promote effective and inclusive relationships with "project-affected parties", "other interested parties" and "vulnerable/disadvantaged groups" throughout the sub-project life cycle;
- Ensuring that sub-project information is publicised in a timely, understandable and accessible manner.
- Providing means for "project-affected parties", "other interested parties" and "vulnerable/disadvantaged groups"by the sub-project to express their opinions, suggestions and grievances

This Stakeholder Engagement Plan, in the first sections, sets out the purpose of the subproject, its area of influence, presents the methodology used in determining stakeholders, specifies the needs of stakeholder categories for effective participation, and the tools and methods through

which their participation will be ensured. Under 5th and 6th headings the plan sets out the structure of the subproject Implementation Unit, what the responsibilities of stakeholders are in implementing the plan, and the structure of the grievance mechanism and how it will function. In the 7th and final section, the plan emphasizes the responsibilities of the parties in monitoring and reporting stakeholder engagement activities and provides a way of how monitoring and reporting activities will be carried out and how feedback will be provided to these groups.

1. INTRODUCTION/PROJECT DESCRIPTION

1.1. Objectives

PUMREP is financed by the World Bank (WB) to support the deployment of RE technologies in municipalities and to scale up renewable energy in the public sector. İLBANK and the WB have established a support system for developing cities to identify, prepare, finance and finance investments for metropolitan municipalities to plan for and invest in a sustainable future, and to develop their urban planning capacities for this purpose. One of the areas of support is in the areas of institutional capacity building and Energy Efficiency and Renewable Energy.

PUMREP (hereinafter referred to as the "Project") aims to increase the use of renewable energy through self-generation in public facilities. The Project will contribute to expanding the market for distributed RE in public facilities, helping to demonstrate leadership in the public sector to use sustainable energy solutions to fulfill the country's climate mitigation commitment and increase energy security.

Within the scope of PUMREP, KASKI plans to establish a land applied Solar Power Plant (SPP) sub-project called KASKI AĞIRNAS SPP for 2,200 kWe connection power.

1.2. Components

The project will be implemented through 4 components:

Component 1: Renewable energy investments in central government facilities

Component 2: Renewable energy investments in municipalities

Component 3: Technical assistance and project implementation support

Component 4: Emergency Response Component (CERC).

KASKİ has applied to ILBANK for sub-financing of KASKİ Ağrnas SPP 2,200 KWe under Component 2. The Sub-Project is located on Block 402, Parcel 9 in Ağırnas Neighborhood, Melikgazi District, Kayseri Province.

1.3. Location

KASKI's 2,200 KWe Solar (Photovoltaic) Power Plant Project' is located in Melikgazi district of Kayseri province. Kayseri is located in the Central Anatolia Region of Turkey. The sub-project area is located within the borders of Ağırnas Neighborhood of Melikgazi District, one of the central districts of Kayseri Province. The distance of the sub-project area to Kayseri city center is 24 km. The closest building to the sub-project area is a barn within the boundaries of Ağırnas Neighborhood, which is 50 m away from the sub-project area.

The land of the sub-project area belongs to KASKI and no land acquisition or expropriation will be required during the construction and operation phases of the sub-project. The electricity to

be generated at the newly established Ağırnas SPP will be connected to the national electricity grid through the existing KASKİ KEYKUBAT Distribution Center next to the same SPP site via an underground earth line to be excavated within the SPP site. The pole to which the power transmission line will be connected is located within the parcel adjacent to the sub-project area. Kayseri KASKİ has written an official letter to KCETAŞ, the electricity distribution company, requesting that the pole be moved within the sub-project area. KCETAŞ has officially stated in writing that the number of pole HC0099 will not be changed after the pole relocation processTherefore, there is no land acquisition is required for the ETL.

Information on the Sub-Project location is presented in Table 1.

Table 1: Sub-project Location

Information	Remarks/ Notes
Province	Kayseri
District	Melikgazi
Neighborhood/ Village	Ağırnas
Land Area (ha)	40.408,26
Land Use Type according to Title Deed	Field
Current Land Use	There is a water tank belonging to the 12th Regional Directorate of State Hydraulic Works within the land and there are no official or unofficial activities in the rest of the land.
Other Nearby Facilities and Activities	There are barns 50 m, 200 m, 300 m, 400 m, 500 m, 650 m, 700 m away from the land where the subproject will be implemented.

A map of the Sub-project location is presented in figure 1:

Figure 1: Sub-project location

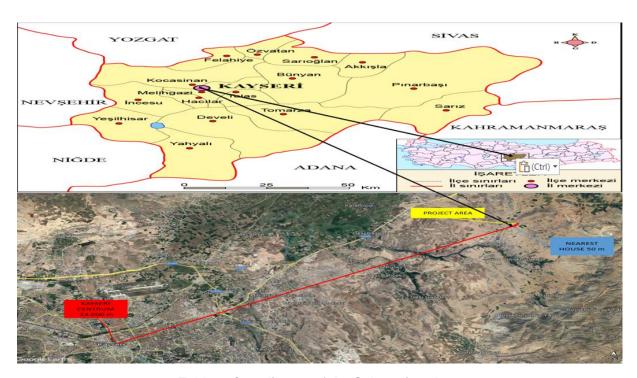


Table 2. Coordinates of the Sub-project Area

Unit	Coordinates (WGS84 in decimals)		
	Υ	X	
Sub-project Area	38.834735	35.731360	

1.4. Area of Influence

According to the WB ESSs, "where the project includes specifically identified physical elements, issues and facilities likely to generate impacts, environmental and social risks and impacts will be defined as the project impact area (IA)." Thus, the IA of the sub-project consists of urban or rural areas likely to be affected by the sub-project, its activities and the facilities directly owned, operated, or managed (including by contractors/subcontractors).

The impact area of the sub-project covers the following environmental and social aspects:

The sub-project site, surrounding settlements and access roads were assessed to determine the Area of Influence (AI). When a circle with a diameter of 600 m is drawn from the sub-project area to determine the Area of Influence (AI), the closest settlement is two barns located within the Ağırnas neighborhood boundary. The distance of the nearest barn in Ağırnas neighborhood to the sub-project area is 50 m. Considering the environmental and social impacts that will be caused by the Subproject, it is foreseen that the owners of the barns engaged in animal husbandry in this neighborhood will be affected by dust, noise and traffic in the subproject area, especially due to the stripping of topsoil; since both barns are used for animal husbandry with the livestock breeding method and the animals are not taken out for grazing, the animal husbandry activities in the barns will not be affected by the subproject activities. Therefore, due to dust, noise and traffic, these barns are included in the AI of the Subproject. Information and consultation activities will be carried out to ensure that these

stables are not affected by these risks or to minimize the impacts. There are also 5 other barns located 300 m, 400 m, 500 m, 650 m and 700 m from the subproject area, they are located on the access road to the sub-project. Due to traffic risks these barns have been assessed within the Impact Area.

Additionally, the closest residential areas to the sub-project are nine houses located on the access road to Ağırnas neighborhood. Although these houses are 600 meters away from the sub-project area, they are located on the access road to the sub-project and therefore pose a traffic risk. For this reason, these houses have been assessed within the Impact Area. On the other hand, agricultural lands adjacent to the sub-project area are evaluated within the project Impact Area due to potential dust and traffic impacts.

COUNTY OF THE ENGINEER OF THE

Figure 2: Map of Settlements and Facilities Close to the sub-project Area

2. OBJECTIVE/ DESCRIPTION OF SEP

KASKİ AĞIRNAS SPP project will increase the diversity of renewable energy sources and provide sustainable and durable electricity solutions for public services. This sub-project covers the construction of solar power plants, connection to the grid and installation and operation of energy facilities.

This SEP, prepared within the scope of the World Bank's Environmental and Social Standard No. 10, Stakeholder Engagement and Disclosure of Information, provides a framework to support the establishment of a seamless engagement process among stakeholders who are likely to be affected by or interested in the KASKİ AĞIRNAS SPP project. The document also contributes to managing stakeholder expectations and supporting risk management by providing early, frequent and open communication throughout the sub-project lifecycle.

The main objectives of this SEP are presented below;

- Identify stakeholders affected by the sub-project and establish and maintain constructive relationships with all identified stakeholders;
- Establish and promote effective and inclusive relationships with sub-project affected parties throughout the sub-project life cycle;
- Ensuring that sub-project information is publicised in a timely, understandable and accessible manner,
- Providing means for the parties affected by the sub-project to express their opinions, suggestions and grievances

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1. Methodology

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

- Openness and life-cycle approach: Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- Informed participation and feedback: Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analysing and addressing comments and concerns.
- Inclusiveness and sensitivity: Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. 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 that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.
- Flexibility: If social distancing, cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.

For the KASKİ AĞIRNAS SPP project, 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. Affected parties and other interested parties

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the sub-project. Specifically, the following individuals and groups fall within this category:

- Barns close to the sub-project area in Ağırnas Neighborhood
- Residents of Ağırnas Neighborhood
- People who will work within the scope of the sub-project

Other Interested Parties are individuals or groups that are not directly involved in the project, but may nevertheless have an interest in project outputs, decisions or activities. A list of this stakeholder group is presented below:

- Residents living outside the Ağırnas neighborhood, which is close to the sub-project area in Kayseri province
- Ministry of Industry and Technology
- Ministry of Energy and Natural Resources
- Ministry of Environment and Urbanization
- Kayseri Provincial Directorate of Industry and Technology
- Kayseri Provincial Directorate of Environment, Urbanization and Climate Change
- Kayseri Governorate
- Kayseri Metropolitan Municipality
- Melikgazi District Governorate
- Melikgazi District Municipality
- 12th Regional Directorate of State Hydraulic Works
- Turkish Electricity Transmission Company (TEIAS) 11th Regional Directorate
- Turkish Electricity Distribution Corporation (TEDAŞ) 13th Regional Directorate
- Chamber of Electrical Engineers Kayseri Provincial Representative Office
- Anadolu Agency Regional Directorate
- Local Television Channels and Newspapers

3.3. Disadvantaged/ vulnerable individuals or groups

Vulnerable and disadvantaged groups living in Ağırnas Neighborhood, where the sub-project area is located, have been identified as follows:

- Persons with disabilities and their caregivers: During the field studies, it was identified
 that 6 persons with disabilities (3 physically and 3 mentally) live with their families in
 this neighborhood. Persons with disabilities may not be able to read the information
 materials due to their physical disadvantages and may have problems accessing the
 venues where information meetings are held. Caregivers of persons with disabilities
 may find it difficult to leave them behind and attend information meetings.
- Female-headed households: The mukhtar shared the information that there are 30 women in the neighborhood who have lost their husbands, live with their children and are responsible for providing for the household. These women may have difficulties in participating in information activities due to the intensity of their domestic and extracurricular labor processes and their inability to leave their children behind.
- Migrants and refugees: 11 Syrian migrants were identified in the neighborhood. The
 mukhtar stated that all of them make a living as shepherds. This group may find it
 difficult to participate in information activities due to the language barrier.

According to information obtained from the mukhtar, none of these vulnerable and disadvantaged individuals live within the Impact Area of the sub-project.

4. STAKEHOLDER ENGAGEMENT PROGRAM

The stakeholder engagement program outlines the engagement process, methods, including sequencing, topics of consultations and target stakeholders.

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

The needs, participation and access status of each of the stakeholders identified under the previous heading will be different from each other. The appropriate methods, tools and techniques for each stakeholder group are described below:

• Project Affected Parties (PAPs)

Stakeholder Group	Needs	Method, Tools,	Frequency
Residents of Ağırnas Neighborhood	To be informed about sub-project activities	 Announcements to be published on the websites and social media accounts of the relevant public institutions Brochure distribution in the relevant field of activities Hanging information posters around the relevant activity areas Distributing Arabic translations of relevant materials in locations where Syrian refugees are living Conducting community consultation meeting Publications in local and national level media organs 	Before the construction phase starts In case of demand or significant change
Barns close to the sub-project area in Ağırnas Neighborhood	To be informed about sub-project activities	 Announcements to be published on the websites and social media accounts of the relevant public institutions Brochure distribution in the 	 Before the construction phase starts In case of demand or significant change

		relevant field of activities Hanging information posters around the relevant activity areas Distributing Arabic translations of relevant materials in locations where Syrian refugees are living Conducting community consultation meeting Publications in local and national level media organs	
Persons who will work within the scope of the subproject	To be informed about sub-project activities	 Formal meetings with them Correspondence to them 	 Before the construction phase starts In case of demand or significant change

• Other Interested Parties (OiP)

Stakeholder Group	Needs	Method, Tools, Techniques	Frequency
Residents outside the sub-project area in Kayseri province	To have general information about the sub-project	Announcements to be published on the websites and social media accounts of the relevant public institutions	In case of demand or significant change
 Ministry of Industry and Technology Ministry of Energy and Natural Resources Ministry of Environment and Urbanisation 	To have general information about the sub-project	 Correspondence to them Announcements to be published on the websites and social media accounts of the relevant public institutions 	Quarterly

•	Kayseri				
	Provincial				
	Directorate of				
	Industry and				
	Technology				
•	Kayseri				
	Provincial				
	Directorate of				
	Environment,				
	Urbanisation				
	and Climate				
	Change				
•	Kayseri				
	Governorship				
•	Kayseri				
	Metropolitan				
	Municipality				
•	Melikgazi				
	District				
	Governorship				
•	Melikgazi				
	District				
	Municipality				
•	Turkish				
	Electricity				
	Transmission				
	Company				
	(TEIAS) 11th				
	Regional				
	Directorate				
•	Turkish				
	Electricity				
	Distribution				
	Corporation				
	(TEDAŞ) 13th				
	Regional				
	Directorate				
•	Chamber of				
	Electrical				
	Engineers				
	Kayseri				
	Provincial				
	Representative				
	Office				
•	Kayseri KASKİ				
	12th Regional				
	Directorate of				
	State Hydraulic				
	Works				
	VVOING				
Media:		To be informed abou	t •	Announcements to	Quarterly
ivicula.	Anadolu			be published on the	Quartony
•		the sub-project	L	websites and social	
	Agency	activities		media accounts of	
				media accounts of	

Regional	the relevant public
Directorate	institutions
Local	One-on-one
Television	interviews
Channels and Newspapers	Press release

• Disadvantaged/Vulnerable Individuals or Groups

Stakeholder Group	Needs	Method, Tools,	Frequency
		Techniques	
People with disabilities and their carers	People with disabilities may not be able to read information materials due to physical disadvantages and may have problems accessing the venue of information meetings. Carers of people with disabilities may find it difficult to leave their carers behind and attend information meetings.	Materials suitable for visually impaired individuals can be prepared. Care should be taken to ensure that the venues where public participation meetings will be held are suitable for the physically disabled. Informative materials can be delivered to the caregivers of disabled people through one-to-one interviews. Transport support can be provided when they attend public participation meetings.	Before the construction phase starts In case of demand or significant change
Female-headed households	These women may find it difficult to participate in information activities due to the intensity of their domestic and non-domestic labour processes and their inability to leave their children behind.	Verbal information can be provided through one-to-one or group-orientated interviews.	Before the construction phase starts In case of demand or significant change
Migrants and refugees	The level of participation may remain low due to language barriers.	Materials should be translated into Arabic and Afghan languages (Darji, Pashto, etc. as needed).	Before the construction phase starts In case of demand or

	Group-orientat	ed	oral	significant
	information	can	be	change
	provided.			

4.2. Summary of Stakeholder Engagement Done During Sub-Project Preparation

On 05.03.2025, Ağırnas Neighborhood Mukhtar was interviewed. Photographs of the meeting and the consultation form are presented in Annex E. During the meeting, the neighborhood mukhtar was informed about the sub-project; information was obtained about the socioeconomic status, population, demographic structure, livelihoods, education and health services, infrastructure services, transportation and traffic services, cultural assets and vulnerable groups.

On the same date, the owner of the barn located in the impact area of the sub-project area and closest to the sub-project area was interviewed. The owner of the barn stated that he did not want this consultation to be verbal and that he did not want any form to be filled in. Photographs of the interview are presented in Annex F. During the interview, the owner of the barn stated that he is a cattle breeder, that he has 74 animals in the barn, that he does not take his animals out to graze, that he does barn-based livestock breeding, that he also has a few hives of bees to meet the needs of his own house, that his house is located in Ağırnas Neighborhood, and that he uses the barn and the accompanying structures for livestock breeding activities.

In addition, on the same date, the owner of the barn located 200 m away from the sub-project area was visited to meet with the owner of the barn, but it was found that there was no one in the barn. A photograph of the visit is presented in Annex G. The owner was then contacted via the phone number written on the door and stated that he was in Kayseri city center and did not have time for a meeting. He was then informed about the sub-project over the phone. In this phone call, the owner of the barn stated that he keeps livestock in the barn, that he does not take his animals out to graze, that he does barn-based livestock breeding, that his house is located in Ağırnas Neighborhood, and that he uses the barn and accompanying structures for livestock breeding activities.

Limited agricultural use had previously been identified in the sub-project area, and a consultation meeting was held with the relevant user. During the meeting, it was confirmed that this activity was not the household's main source of income and was not commercial in nature, and that the household was also engaged in agricultural activities in other areas. The form regarding the consultation meeting is provided in Annex H.

4.3. Stakeholder Engagement Plan

A stakeholder engagement plan is an important tool for a project or organisation to communicate effectively with its stakeholders, manage the project successfully and achieve its objectives.

The first Stakeholder Consultation Meeting (SCM) of the sub-project will be held following the approved by İLBANK draft ESMP report in a selected venue in Ağırnas 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 KASKİ'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 KASKİ 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 KASKI.

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.

. A summary of this is presented in table 3 below:

Table 3: Stakeholder Engagement Plan

	Table 3. Stakeholder Engagement Flair					
Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities	
Pre- construction	Before the construction activities start Draft ESMP and SEP of the subproject to be disclosed and consulted for finalization.	Informing about sub-project activities and recording comments and suggestions, answering questions Informing anticipated E&S impacts and risks Informing about Grievance Mechanism	Conducting public participation meeting, publishing information about subproject activities	Project Affected Parties	Contractor Consultant Kayseri KASKİ	
	Before the construction activities start Draft ESMP and SEP of the subproject to be disclosed and consulted for finalization.	Informing about sub-project activities Informing anticipated E&S impacts and risks Informing about Grievance Mechanism	Announcements to be published on the websites and social media accounts of the relevant public institutions	Other Interested Parties	Contractor Consultant Kayseri KASKİ	
	Before the construction activities start Draft ESMP and SEP of the subproject to be disclosed and consulted for finalization.	Informing about sub-project activities and recording comments and suggestions, answering questions Informing anticipated E&S impacts and risks Informing about Grievance Mechanism	One-to-one face- to-face interviews, focus group meetings, leaflet distribution	Disadvantage/Vulnerable Individuals or Groups	Contractor Consultant Kayseri KASKİ	
Construction	During the construction phase	Informing about sub-project activities and recording comments and suggestions,	Conducting public participation meeting, publishing information	Project Affected Parties	Contractor Consultant Kayseri KASKİ	

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		answering questions	about sub- project activities		
	During the construction phase	Informing about the sub-project activities	Announcements to be published on the websites and social media accounts of the relevant public institutions, correspondence between institutions	Other Interested Parties	Contractor Consultant Kayseri KASKİ
	During the construction phase	Informing about sub-project activities and recording comments and suggestions, answering questions	One-to-one face- to-face interviews, focus group meetings, leaflet distribution	Disadvantage/Vulnerable Individuals or Groups	Contractor Consultant Kayseri KASKİ
Operation	During the operation phase	Informing about the sub-project activities	Announcements to be published on the websites and social media accounts of the relevant public institutions	All stakeholder categories	Kayseri KASKİ

KASKI will make sub-project E&S documents available on its website in both Turkish and English¹. These documents will also be accessible at KASKI office and Melikgazi District Municipality. In addition, sub-project posters and information on the grievance mechanism will be displayed at local points, including Ağırnas 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.

4.5. Proposed Strategy to Incorporate the Views of Vulnerable Groups

During the construction phase, KASKİ social expert might first announce the time and place of the construction works to the locals. During the information activity, the social expert will also investigate the above mentioned disadvantaged individuals and assess required mitigation activities in order to eliminate the negative impacts of the construction works. It has to be kept in mind that requiring information from secondary information sources like mukhtars or teachers might not be enough as the persons with disadvantages may not be officially registered in any health care or educational institution. As a matter of fact, a detailed Public Consultation Meetings have to be conducted in order to identify them. Face-to-face meetings will be conducted with any identified disadvantaged/vulnerable person. In case of any communication irrelevancy (i.e. with individuals with mental disabilities or children) meetings will be conducted with parents or relatives.

During the planning and execution stages of the sub-project, efforts will be made to gather opinions of vulnerable or disadvantaged groups in order to guarantee that their needs are taken into account. Households with persons with disabilities, households headed by women, households headed by Syrian refugees, and households headed by seasonal agricultural laborers are examples of vulnerable or disadvantaged populations. However, this list is not

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¹ https://www.kaski.gov.tr/

exhaustive. Getting these groups involved is absolutely necessary in order to promote inclusiveness and address the challenges that are unique to them.

It is planned to interact with the mukhtars and non-governmental organizations (NGOs) that work closely with these communities in order to identify these groupings. In order to guarantee the inclusion of certain groups, interviews and home visits will be carried out for those groups.

To further ensure the inclusion of vulnerable groups—such as seasonal agricultural workers or refugees—KASKİ's Project Social Expert will prioritize gathering information on these groups during field visits and consultation preparations.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

As summarized in above, the Sub-Project will be implemented through the financing provided by the PUMREP Loan Agreement signed between the World Bank and İLBANK. Therefore, while the World Bank is the financer, İLBANK is the financial intermediary of PUMREP and has established a Project Management Unit (PMU). İLBANK has already designated environmental, social and OHS experts who manage safeguard issues under PUMREP.

At the Sub-Project level, KASKİ has also established a Project Implementation Unit (PIU) and appointed one environmental expert, one social expert and one OHS expert to manage safeguard issues.

The organization structure of the PIU to be established by the Sub-borrower is presented in **figure 3**:

Figure 3: PIU Organization Chart

Project Implementation Unit Personnel List
Contract Management
Deputy General Manager
Procurement Unit
Branch Manager
Construction Technician
Technical Management
Department Head
Technical Unit
Branch Manager - Civil Engineer
Civil Engineer
Civil Engineer
Electrical Technician
Electrical - Electronics Engineer
Mechanical Engineer
Mapping Technician
Financial Management
Branch Manager
Financial Unit
Officer
Monitoring and Evaluation
Civil Engineer
OHS
Occupational Health and Safety and Civil Defense Branch Manager
Social Specialist
Social Specialist/Sociologist
Environmental Specialist
Environmental Engineer

The Sub-Borrower will ensure the continuity of the PIU by ensuring the appointment and deployment of qualified staff and the continuity of Stakeholder Engagement Activities by allocating an appropriate budget throughout the life cycle of the sub-financing agreement.

Social Specialist who is shown in the organisation chart of the Project Management Unit, will follow the implementation of the Stakeholder Engagement Plan on behalf of KASKİ. People will be able to communicate their opinions, suggestions or questions about the sub-project or consultation process to this focal person.

5.2. Management functions and responsibilities

KASKI Project Implementation Unit (PIU) will be the party primarily responsible for the implementation of the SEP. KASKI PIU will have designated staff with responsibilities related to ESMP, SEP and GM.

In addition to KASKI PIU, the responsibilities and activities to be carried out by other stakeholders for the effective implementation of the SEP are presented in the table below:

Table 4: Responsibilities

Responsible	Responsibilities	Activities
PMU of ILBANK	Monitor and control whether KASKI fulfills its responsibilities;	 Accelerating and monitoring the formation of PIUs to ensure proper implementation of the processes related to the grievance mechanism and stakeholder engagement issues; Coordinating the parties for proper implementation of the processes regarding the grievance mechanism and stakeholder engagement issues
PIU of KASKI	Planning, implementation, monitoring and reporting of SEP	 Conducting stakeholder engagement activities in close co-operation with ILBANK Project Management Unit Management and resolution of grievances Counselling on specific SEP activities; Publicising major construction activities (such as road closures and service interruptions); Reporting to ILBANK Project Management Unit on the implementation of SEP activities; Effective implementation of the identified grievance mechanism in SEP and informing ILBANK Project Management Unit about the overall implementation status.
Supervision Consultant	To monitor and control whether Contractor fulfils its responsibilities	 Review the SEP document to redefine the stakeholders affected by and/or interested in the sub-project and to follow up the implementation of the methods, instruments, timing and participation levels identified in the SEP, Interviews KASKI PIU and others involved in the stakeholder engagement process to review progress and identify critical issues, Consults with affected households and community leaders through key informant interviews to identify their feedback on stakeholder engagement performance of the sub-project, Interacts with various stakeholders to get their views on SEP implementation, Controls whether the necessary trainings are given to the personnel who will work during the construction phase, Reviews grievance records to identify significant non-compliances or recurring issues with stakeholder engagement and other sub-project activities and to reveal actions, Meets with WB safeguard policies and audit teams and responds to queries as necessary, Monitors and reports on progress made in relation to the commitments defined in SEP.

Responsible Entity	Responsibilities	Activities
Contractor	 To inform İLBANK on all matters related to relations with stakeholders; To communicate and resolve grievances arising from subproject activities in close and cooperation with İLBANK 	 Implements and develops Contractor's social policy, Provides necessary resources for proper remedial actions, Notify KASKI of any issues related to interaction with stakeholders; Communicate and resolve grievances arising from subprojectactivities in line with KASKI's guidance; Inform ILBANK Project Management Unit and KASKI about significant construction activities (such as road closures and service interruptions) and issues related to their interaction with stakeholders; Maintain communication with KASKI Grievance Mechanism Contact Point for follow-up of grievances; Organising and conducting Stakeholder Participation/Consultation Meetings and related activities related to information sharing with the public; Inform relevant local communities on environmental and social issues (e.g. noise, vibration, water quality monitoring, community health and safety, etc.); Develop and implement a grievance mechanism for the environmental and social performance of the sub-project and the labour force, including sub-contractors, prior to the commencement of construction works, in compliance with KASKI's Grievance Mechanism requirements. The construction contractor should develop monthly ESMRs and submits to KASKI through the Supervision Consultant

6. GRIEVANCE MECHANISM

In line with ILBANK Environmental and Social Management System and World Bank's Environmental and Social Standard (ESS) 10 a grievance mechanism will be established by KASKİ to receive, resolve and follow up the concerns and grievances of sub-project affected communities. KASKİ PIU will be accessible to stakeholders and will respond to all grievances (complaints, requests, opinions, suggestions) at the earliest possible time. The most important point in the grievance mechanism is to ensure that all grievances are effectively received, recorded, resolved and responded by the PIU in a predetermined timeline and according to their content, and to ensure that the corrective/regulatory action to be taken is acceptable to both parties. Such responses to grievances will be satisfactory to both parties and activities will be monitored and complainants will be informed about the results of corrective actions. In addition, the mechanism required to designed to be suitable for receiving and redressing anonymous grievances. The grievance form in the Annex A will be used in the sub-project and anonymous submission of grievances will be allowed. In addition, the sub-project Grievance Mechanism will include a channel to receive and address confidential grievances related to Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) for which special measures are taken. KASKİ PIU is responsible for establishing close relations with all stakeholders. In case a grievance is received in any of the grievance mechanisms presented below at different levels, the operational flow chart of the grievance mechanism will be followed. This

Table 5: The operational flow chart of the Grievance Mechanism

scheme is presented in table 5:

Grievance Process	5	Requirement / Action
Submitting grievance	the	Receiving the grievance by any communication channel explained in SEP.(At this point, if the grievance is a sensitive grievance involving child abuse, sexual harassment or Gender Based Violence (GBV), immediate action will be taken within 2 days of receipt of the grievance. In cases of sexual abuse and harassment or potential child abuse at sub-project sites, the grievance will be referred by the GM focal point (located at ILBANK headquarters) to the relevant legal authorities/service providers such as the Ministry of Family and Social Services, Public Prosecutor's Office)
Recording grievance	the	The sample grievance will be registered by making an entry in the registration table. All grievances will be logged and feedback given to the complainant within two working days. If the complainant requests that this grievance be handled anonymously, the grievance will be logged anonymously and this request will be honoured.
Referring grievance	the	The grievance will be forwarded to the relevant persons responsible for dealing with the grievance (site manager and Project Implementation Unit specialists at construction sites) no later than three working days after receipt (grievances involving emergency situations will be dealt with immediately as appropriate).
Assessment grievance	the	Assessment of grievances within 10 working days and determination of whether the grievance meets the admissibility criteria.
Responding to grievance	the	If the grievance is valid, corrective measures to resolve the grievance are determined and taken within 15 working days at the latest. If the resolution of the grievance will take longer, a partial response should be given to the complainant and the Grievance Closure Form should be completed.

	All comments and grievances will be responded to verbally or in writing in line with the communication method preferably specified by the complainant, if contact information is provided. At this point, it should be noted that the action and result taken for the anonymously recorded grievance should be shared on KASKI's website so that the anonymous complainant can be informed about the grievance and results.
Recording the outcome of the grievance	Processing of the grievance result in the registration table
Right to object	If the grievance cannot be resolved through the current process, applicants can always appeal to the relevant legal authorities. These institutions can be summarised as follows:
	- Civil Courts of First Instance
	- Administrative Courts
	- Commercial Courts of First Instance
	- Labour Courts, and
	- Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

6.1. Project Level Grievance Mechanism

The existing grievance mechanism of Kayseri KASKI will be utilised at sub-project level. In addition, measures will be implemented to ensure that anonymous grievances can be submitted and that cases of sexual harassment and sexual exploitation are received confidentially. Information on KASKI's grievance mechanism is provided below:

Website(includes an online grievance form): https://www.kaski.gov.tr/iletisim

E-mail: kaski@kaski.gov.tr

Call Centre: 185

Phone Number: +90 352 432 04 32

Adress: Yakut Mah. Mustafa Kemal Paşa Bul. No:186 Kocasinan / KAYSERİ

6.2. National Level Grievance Mechanism

ILBANK established a transparent and comprehensive Grievance Mechanism (GM) in September 2021 to receive, assess and resolve grievances related to each international project it finances and will be in place throughout the life cycle of this subproject. Stakeholders may, if they wish, submit their comments, suggestions and grievances to ILBANK through the following means of communication:

Website: https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi

E-mail: bilguidb@ibank.gov.tr and etikuidb@ilbank.gov.tr

Phone Number: +90 312-508 79 79

Address: ILBANK International Relations Department, Emniyet Mahallesi, Hipodrom Caddesi,

No:9/21, Yenimahalle/ANKARA

In the last 10 years, Turkish citizens have adopted a centralised grievances system called the Presidential Communication Centre (CİMER). People from all walks of life and professions have developed the habit of writing letters of grievance to CIMER by e-mail. Therefore, this system should be added to institutional grievance mechanisms. Operating under the Presidential Directorate of Communication, CMER aims to strengthen the state-society relationship. The information on CİMER is following:

Website: www.cimer.gov.tr

Call Centre: 150

Phone number: +90 312 525 55 55

There is also a grievance mechanism established for foreigners in Türkiye under the Presidency's Directorate of Communication. Information on the Foreigners Communication Centre (YİMER) is provided below:

Website: www.yimer.gov.tr

Call Centre: 157

Phone number: +90 312 5157 11 22

6.3. Grievance Mechanism for Workers

A separate grievance mechanism will be provided for all direct workers and subcontracted workers (and their organisations where relevant) to raise workplace concerns in accordance with the requirements of ESS2. These workers will be informed about the Grievance Mechanism and Code of Conduct (CoC) at the time of recruitment and will be provided with safeguards to protect them from retaliation for using this mechanism. The Workers' Grievance Mechanism (WGM) will be accessible to all workers and subcontractor workers. Grievances will be collected and reported to be managed within the scope of SEP, Workforce Management Plan (LMP) and Grievance Mechanism Procedure. Sub-project workers will be able to raise workplace issues such as unsafe or unhealthy working conditions, working conditions, wages, discrimination, harassment, health and safety concerns or other employment related issues through the grievance mechanism. It will be ensured that the grievance mechanism will be easily accessible for all workers of this sub-project. The design of the workplace grievance mechanism takes into account the grievance mechanism elements defined in the ESS10 and related guidance.

The process defined in the grievance flow chart will also be applied and executed for the workers' grievance mechanism. During the construction phase, the workforce requirement of the subproject will be 30 people at peak. Priority will be given to local employment. For these reasons, a campsite will not be established for the accommodation of workers. Grievance boxes will be placed in places such as cafeteria, common resting area and work area where workers can easily reach but away from security cameras. The boxes will be checked regularly and can only be opened by the responsible person. The Grievance Mechanism for Workers will follow a structured process to address grievances in a timely and fair manner. Workers will

be able to submit their grievances anonymously if they so wish. The grievance mechanism for workers guarantees that grievances will be investigated impartially and that there will be no retaliation against workers who file grievances. Workers' grievances will be kept in the grievance database.

6.4. Sensitive and Confidential Grievances

Specific procedures will be implemented by the sub-project in order to address sensitive and confidential grievances, particularly those that are related to Sexual Exploitation and Abuse/Harassment (SEA/SH). These measures will be implemented in accordance with the World Bank ESF Good Practice Note on SEA/SH.

First of all, the complaining party has the right to remain confidential under the Turkish Constitution and the right to apply to the court at any time (in accordance with the Turkish Labor Law No. 4857 and the Turkish Civil Code No. 4721). In addition, Sub-Borrower personnel and sub-project employees will be able to directly communicate (via e-mail) with the Ethics Committee based at İLBANK Head Office in case of sensitive grievances. This issue will be clarified in the consultations carried out and in the introduction of the grievance mechanism. For cases related to gender-based violence, SEA/SH in the workplace or any potential child abuse in sub-project implementation/sub-project sites, the grievance will be directed to the relevant legal authorities or service providers by the Social Focal Point (based at ILBANK Head Office).

In addition to the legal processes, the subproject will integrate a number of important steps in order to efficiently address sensitive grievances, such as those connected to SEA/SH. There will be methods for confidential reporting that will be implemented. These mechanisms will provide safe and easily available channels, such as call centers of KASKİ.

Grievances shall be handled in an impartial manner through the implementation of transparent and fair investigation procedures. The grievance mechanism tools described above will be used. However, in the case of grievances related to gender equality, sexual exploitation and abuse (SEA), or sexual harassment (SH), these will be given priority by the designated social specialists. All grievances will be treated as confidential, with additional safeguards applied to ensure the anonymity of complainants, particularly for such sensitive cases. Individuals will be able to submit their complaints confidentially and without pressure. Complaints should be submitted to the responsible grievance officer, who must, within 24 hours and only with the explicit consent of the complainant, forward the grievance directly to the social specialist responsible for the project within the PMU. The PIU Head may be informed only if they are not the initial recipient of the complaint. No other party shall be informed or involved, ensuring maximum protection of the complainant's identity. Regular awareness and training workshops will be held for all team members and stakeholders involved in the sub project. The social expert of the contractor and the social expert of KASKI will organize consultation meetings to increase awareness of the subject matter. These sessions will concentrate on SEA/SH issues, preventative techniques, and reporting responsibilities in order to promote understanding and prevention.

7. MONITORING AND REPORTING

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

Reporting process that should be put into action during the implementation phase of the Project is an important tool to record and chase Project activities in compliance with the national and WB standards. Therefore, the requirements of such processes are presented table 6:

Table 6: Reporting Process Requirements and Distribution of Roles

Responsible Party	Roles & Responsibility	
PIU	Submit monthly Environmental and Social Monitoring Reports (ESMR) prepared by the contractor to ILBANK	
Construction Supervision Consultant	Check the monthly Environmental and Social Monitoring Reports prepared by the Contractor and submit them to the PIU	
Contractor	The contractor will prepare monthly Environmental and Social Monitoring Reports including grievance records and stakeholder engagement activities to be submitted to KASKI and submit them to the consultant firm for control.	

The ESMRs will include following indicators on grievance mechanism and stakeholder engagement activities:

Indicators for stakeholder engagement:

- Number of public participation meetings
- Number of participants of the public participation meetings disaggregated by gender, age, disability, nationality
- For each meeting, the minutes of meetings, actions agreed during these meetings, the status of these actions and how the comments have been incorporated into the subproject activities will be included in the environmental and social monitoring reports

Indicators for grievance mechanism:

- Number of grievances in total and at local level
- Number of grievances received from stakeholders, sorted and analysed by category

Number of grievances that were (i) opened (ii) open for more than 30 days (iii) resolved (iv) closed and (v) included responses that satisfied complainants during the reporting period

7.2. Reporting back to stakeholder groups

During the preparation and construction phases of the Subproject, the construction contractor will prepare monthly reports on environmental and social performance for submission to Kayseri KASKI, which will include updates and indicators on the implementation of the stakeholder engagement plan. The monthly reports will be shared with ILBANK and ILBANK will provide quarterly reports to the World Bank.

The person/unit to be assigned by Kayseri KASKI will provide feedback to stakeholder groups through public meetings, primarily in the subproject impact area. The summary of the public meetings will be published after the removal of identifying information in accordance with the Law on the Protection of Personal Data. Feedback received through the Grievance Mechanism (GM) will be responded to in writing and verbally. Important updates on the sub-project will be published on the website of Kayseri Metropolitan Municipality and Kayseri KASKI.

ANNEXES

Annex-A Sample Grievance Submission Form

	KASKI			
	SOLAR POWER PLANT PRO	DIFCT		
		JEC1		
	GRIEVANCE FORM			
Person Filling Out the Form:		Date and time:		
Interview Agenda:		Reference No: KASKI-Project Code- 0001-2		
1. INFORMATION ABOUT TH	IE COMPLAINANT			
Name surname:				
If the complainant requests the anonymously, this grievance will be request will be met.	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	e Associatio NGO		
Interest Groups Industrial Assosiaction	a 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

	KASKI
	SOLAR POWER PLANT PROJECT
	JOEAN FOWEN FEARIT PROJECT
	GRIEVANCE CLOSE OUT FORM
Reference form:	
1. DETERMINATION OF CORRECT	IVE ACTION
1	
2	
3	
4	
5	
2. CLOSE OUT THE GRIEVANCE	
This section will be filled and signed by	
the Complainant in case the grievance	
stated in the "Grievance Registration	
Form" is resolved	
Name Surname /	Name Surname /
Signature of the Person	Signature of Complainant/Date
Closing the Grievance/Date	

Annex-C Sample Consultation Form (For Stakeholder Participation Meeting(s)

	KASKI		
	SOLAR POWER PLAN	IT PRO	DJECT
	CONSULTATION FOR	M	
Person Filling Out the Form:			Date time and place:
Meeting Agenda:			Interview Registration Number:
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 R	oom NGO
Interest Groups Industrial Unions	Labor Union	Medi	<u> </u>
2. INTERVIEW DETAILS (List of Investment will be whom, minutes of meeting will be	·	•	nts, Summary of presentations made by
Questions about the project:			
Concerns/feedback regarding the project:			
Responses to the views expressed above:			

Annex-D Sample Grievance Log Form

	Grievance	How Grievance is Received (Grievance	Level of Grievance (Municipality/Utility Level, Regional)	I I Jata At	Location of		Parcel #	Complainant Inf	formation					Grievance Category (expropriation/land acquisition	Grievance	Grievance Status (open,	Actio
	Number	Form, Community Meeting, Telephone)	Level, Regional)	Received	Received	Grievanice	to land)	Nama/Surnama	ID Number	Telephone/ email	Village- District	Gender	Grievance	related, environmental issues, damages to structures etc.)	Summary	closed or pending)	Respo Perso
1																	

Annex-E Consultation form and photo of the consultation meeting held with the Mukhtar of Ağırnas Neighborhood during the sub-project preparation phase



	ISTIŞARE FORMU	0 06-00	mt 1
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İstişare Yeri	Aginas Multer la	TI III	
Tarih ve Saat	05.03.2025 Hazi	tayan	
Konu	Tartışılan Konular/Alınan Kararlı	ır	
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İstişare Görüşmesi Ad-Soyad	eleberth altzepiss down, leithrel graplor habburd	or lellar v	e house
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	eleberth altzepiss down, leithrel graplor habburd	in what we have a some some some some some some some some	e house

Annex-F Photograph of the consultation meeting with the owner of the barn closest to the subproject area during the subproject preparation phase



Annex-G Photograph of a visit to meet with the owner of a barn near the subproject area during subproject preparation







ISTIŞARE FORMU

İstişare Konusu	faolyetinin, mulle	numaralı araşı de gürütülen tanmı Meti KASKI'ye alit olon 402/9 azı de yapılacak olan Ağırmas intralinden etkilenip etkilenmeyedgil.
İstişare Yeri		
Tarih ve Saat	03/09/2025	Hazırlayan

Konu	Tartışılan Konular/Alınan Kararlar
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İstişare Görüşmesi Katılımcıları

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