

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

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**3.45 MWp / 2.86 MWe Solar (Photovoltaic) Power Plant Project
of Kayseri Water and Sewerage Directorate (KASKI)**

February 2025

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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)
Prepared by	Kolay Enerji Engineering & Consultancy

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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 sub-project. Within the scope of PUMREP, KASKİ plans to install a land-applied Solar Power Plant (SPP) subproject called KASKİ KİBAAT SPP-2 for a connection power of 2,860 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) policies 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 KASKİ Kibaat SPP-2.

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.

This SEP is prepared for Directorate General of Kayseri Water and Sewerage Administration (KASKİ) 3.45 MWp / 2.86 MWe Solar (Photovoltaic) Power Plant Project. 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 project and establish and maintain constructive relationships with all identified stakeholders;
- Establish and promote effective and inclusive relationships with project affected parties throughout the project life cycle;
- Ensuring that project information is publicised in a timely, understandable and accessible manner,
- Providing means for the parties affected by the project to express their opinions, suggestions and complaints

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 complaint 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. ILBANK 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, KASKİ plans to install a land-applied Solar Power Plant (SPP) subproject called KASKİ KİBAAT SPP-2 for a connection power of 2,860 kWe.

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 applied to ILBANK for the sub-financing of KASKİ KİBAAT SPP-2 2.8 MWe under Component 2. The Sub-Project is located on block 167 and parcel 1 of Boğazköprü Neighborhood in Kocasinan District of Kayseri Province. In addition, underground energy cables (200m) will be laid within the same parcel and connected to KASKİ-Kibaat SPP-1 transformer building.

1.3. Location

KASKİ's '3.45 MWp / 2.86 MWe Solar (Photovoltaic) Power Plant Project' is located in Kocasinan district of Kayseri province, Turkey. Kayseri is located in the Central Anatolia Region of Turkey. The sub-project area is located within the borders of Boğazköprü Neighbourhood of Kocasinan District, one of the central districts of Kayseri Province. The distance of the sub-project area to the nearest household in Boğazköprü Neighbourhood is 1.6 km and the distance to Kocasinan district centre (hence to the provincial centre) is 17.5 km.

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

sub-project will be integrated into the existing system of Kibaat SPP 1, which is already in operation at the same location. There is no private land along the Power Transmission Line (ETL) route and 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	Kocasinan
Neighborhood/ Village	Boğazköprü
Land Area (ha)	15.6
Land Use Type according to Title Deed	Field
Current Land Use	Vacant field covered with concrete floor. There is no formal or informal activity in the sub-project area.
Other Nearby Facilities and Activities	KASKI Wastewater Treatment Plant (100 m) Tanrıverdi Agricultural Facility (400 m) Kayboran Plastic Factory (400 m) Keytas animal Feed Facility (530 m) Industrial Area (800 m)

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

Figure 1: Map of Sub-project Location

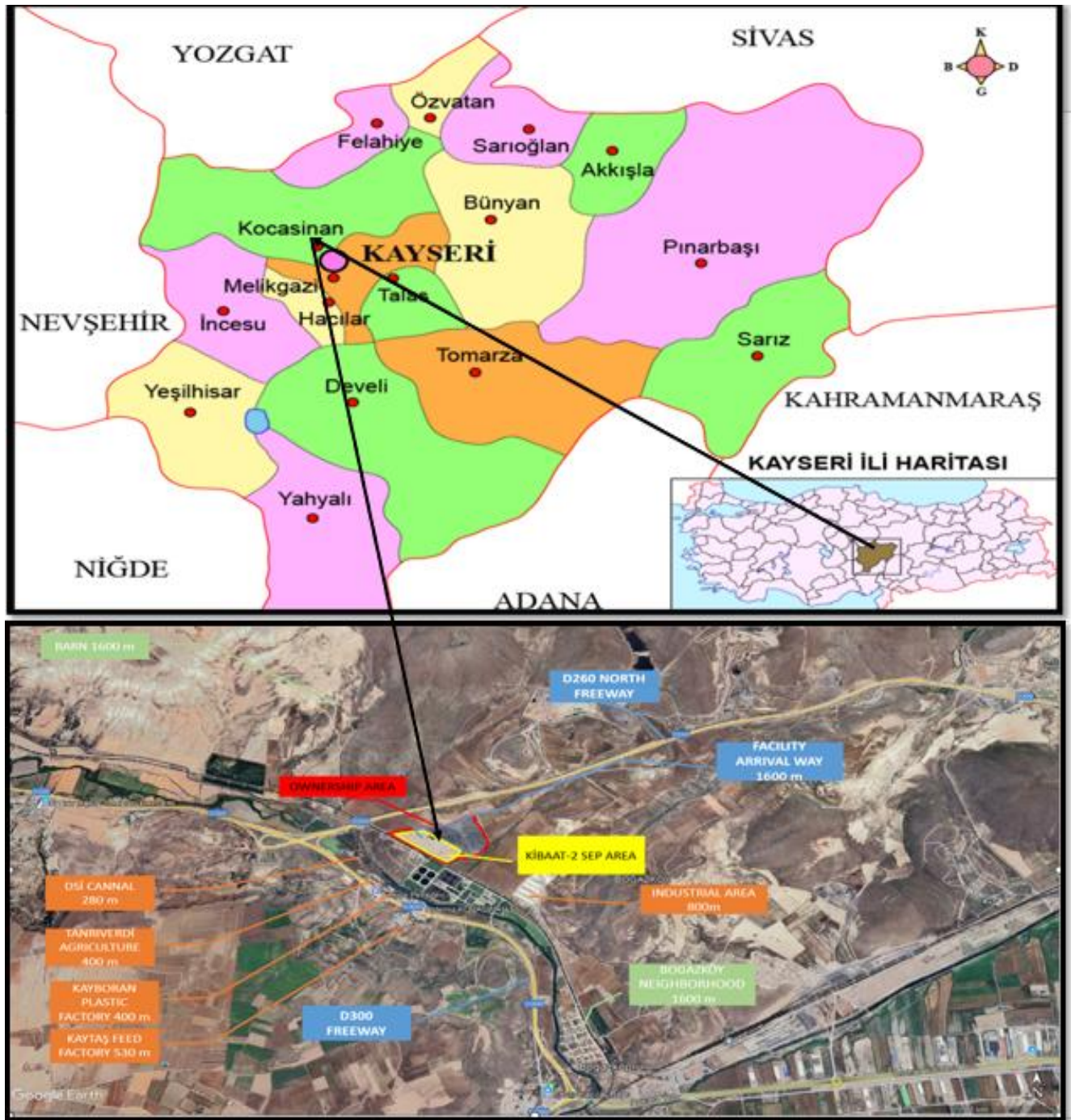


Table 2. Coordinates of the Sub-project Area

Unit	Coordinates (WGS84 in decimals)	
	Y	X
Sub-project Area	35.299926	38.769831

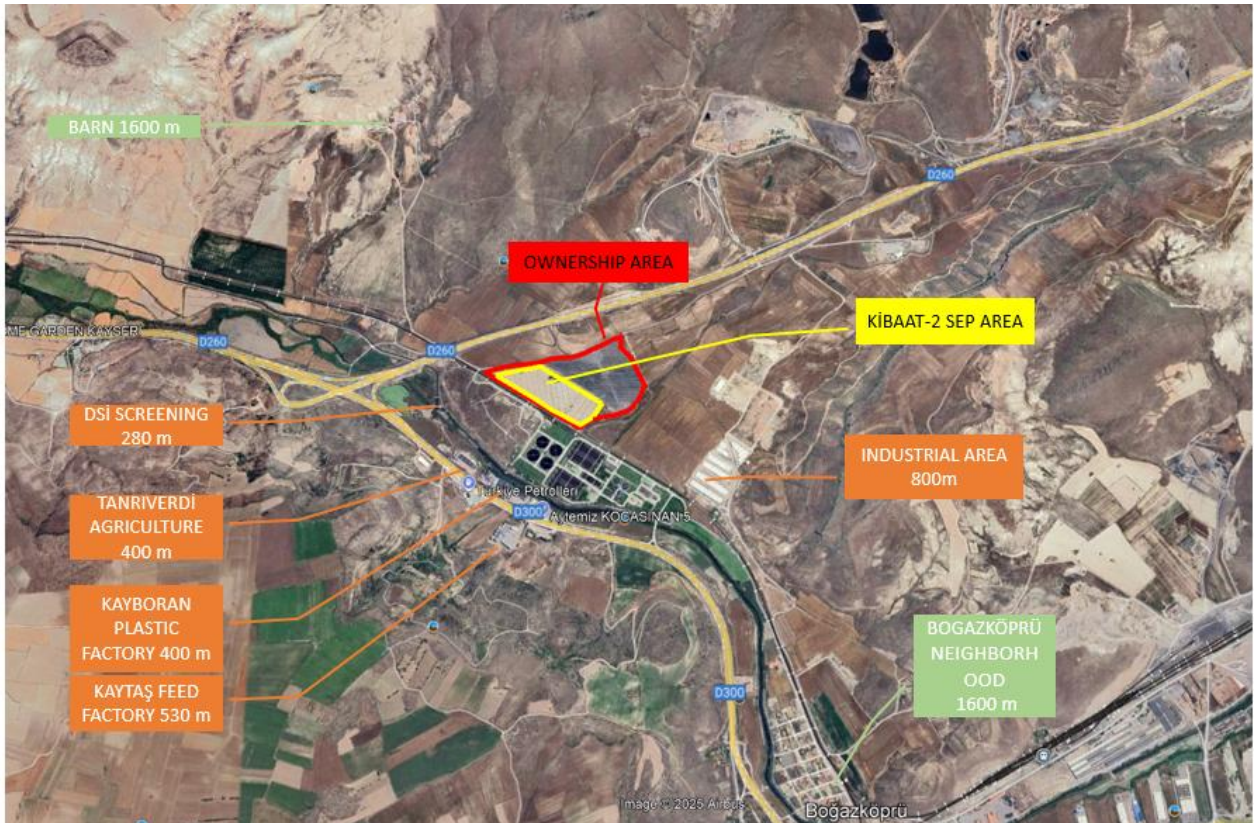
1.4. Area of Influence

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 subproject consists of urban or rural areas likely to be affected by the project, its activities and the facilities directly owned, operated, or managed (including by contractors/subcontractors).

The impact area of the subproject covers the following environmental and social aspects:

The sub-project site, surrounding settlements (Boğazköprü Neighbourhood) and sub-project access roads. When a circle with a radius of 100 m was drawn from the subproject area to determine the Impact Area (IA), the closest settlement to it was Boğazköprü Neighbourhood. Boğazköprü Neighbourhood is approximately 1.6 km from the subproject area. Considering the environmental and social impacts that the subproject will cause, it has been determined that the local community living in Boğazköprü Neighbourhood will not be affected by the subproject. Therefore, Boğazköprü neighborhood is not included within the IA of the Sub-project.

Figure 2: Map of Settlements and Facilities Close to the Subproject Area



2. OBJECTIVE/ DESCRIPTION OF SEP

KASKI KİBAAT SPP 2 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 KASKI KİBAAT SPP 2 project. The document also contributes to managing stakeholder expectations and supporting risk management by providing early, frequent and open communication throughout the project lifecycle.

The main objectives of this SEP are presented below;

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

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 KİBAAT SPP 2 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 Project. Specifically, the following individuals and groups fall within this category:

- Residents of Boğazköprü Neighbourhood
- Persons who will work within the scope of the subproject
- Facilities in the vicinity of the subproject area (Kayseri KİBAAT SPP 1 Facility, Kayseri Metropolitan Municipality High Biological Wastewater Treatment Facility, Tanrıverdi Agriculture, Kayboran Plastic Factory, Kaytaş Feed Factory, Kayseri Mega Collective Workplace Cooperative)

- 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 outside the sub-project area in Kayseri province
- Ministry of Industry and Technology
- Ministry of Energy and Natural Resources
- Ministry of Environment and Urbanisation
- Kayseri Provincial Directorate of Industry and Technology
- Kayseri Provincial Directorate of Environment, Urbanisation and Climate Change
- Kayseri Governorship
- Kayseri Metropolitan Municipality
- Kocasinan District Governorship
- Kocasinan 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
- Anadolu Agency Regional Directorate
- Local Television Channels and Newspapers

3.3. Disadvantaged/ vulnerable individuals or groups

The vulnerable and disadvantaged groups living in Boğazköprü Neighbourhood, the closest settlement to the subproject area, have been identified as follows:

- Over 65 years of age living alone: Through field studies, it was determined that the number of people over the age of 65 living alone in this neighbourhood is 4. It is foreseen that these people may have problems in accessing information due to physical and technological disadvantages.
- Persons with disabilities and their carers: Field studies revealed that 1 disabled person (down syndrome) lives with his/her family in this neighbourhood. Persons 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 persons with disabilities may find it difficult to leave their carers behind and attend information meetings.
- Syrian refugees: There are 10 Syrian immigrants living in the neighbourhood. Level of participation may remain low due to language barrier.

4. STAKEHOLDER ENGAGEMENT PROGRAM

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, Techniques	Tools,	Frequency
Residents of Boğazköprü Neighbourhood	To be informed about sub-project activities	<ul style="list-style-type: none"> • 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 		<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change
Persons who will work within the scope of the subproject	To be informed about sub-project activities	<ul style="list-style-type: none"> • Formal meetings with them • Correspondence to them 		<ul style="list-style-type: none"> • Before the construction phase starts • During the construction phase
Facilities in the vicinity of the subproject area (Kayseri KİBAAT SPP 1 Facility, Kayseri Metropolitan Municipality High Biological Wastewater Treatment Facility,	To be informed about sub-project activities	<ul style="list-style-type: none"> • Formal meetings with them • Correspondence to them • Inviting to community consultation meetings 		<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change

Tanrıverdi Agriculture, Kayboran Plastic Factory, Kaytaş Feed Factory, Kayseri Mega Collective Workplace Cooperative)			
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• **Other Interested Parties(OiP)**

Stakeholder Group	Needs	Method, Techniques	Tools, 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, local media channels and social media accounts of the relevant public institutions	In case of demand or significant change
Public Institutions: <ul style="list-style-type: none"> Ministry of Industry and Technology Ministry of Energy and Natural Resources Ministry of Environment and Urbanisation Kayseri Provincial Directorate of Industry and Technology Kayseri Provincial Directorate of Environment, Urbanisation and Climate Change Kayseri Governorship Kayseri Metropolitan Municipality Kocasinan District Governorship 	To have general information about the sub-project	<ul style="list-style-type: none"> Correspondence to them Announcements to be published on the websites, local media channels and social media accounts of the relevant public institutions 	Quarterly

<ul style="list-style-type: none"> • Kocasinan 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 KASKI 			
Media: <ul style="list-style-type: none"> • Anadolu Agency Regional Directorate • Local Television Channels and Newspapers 	To be informed about the sub-project activities	<ul style="list-style-type: none"> • Announcements to be published on the websites and social media accounts of the relevant public institutions • One-on-one interviews • Press release 	Quarterly

• **Disadvantaged/Vulnerable Individuals or Groups**

Stakeholder Group	Needs	Method, Tools, Techniques	Frequency
Over 65 years of age living alone	They may have problems accessing information due to physical and technological disadvantages	Verbal information can be provided through one-to-one or group-oriented interviews, or transport support can be provided to attend meetings	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change

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.	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change
Syrian refugees	The level of participation may remain low due to the language barrier.	Materials should be translated into Arabic. Group orientated verbal information can be given.	<ul style="list-style-type: none"> • Before the construction phase starts • In case of demand or significant change

4.2. 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. This tool includes who will communicate with which stakeholder group, at which stage of the project, with which objectives and methods in line with these objectives. A summary of this is presented in table 3 below:

Table 3: Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	Before the construction activities start	Informing about project activities and recording comments and suggestions, answering questions	Conducting public participation meeting, publishing information about project activities	Project Affected Parties	Contractor Consultant Kayseri KASKİ
	Before the construction activities start	Informing about project activities	Announcements to be published on the websites and social media accounts of the	Other Interested Parties	Contractor Consultant Kayseri KASKİ

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
			relevant public institutions		
	Before the construction activities start	Informing about 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, Supervision Consultant, Kayseri KASKİ
Construction	During the construction phase	Informing about project activities and recording comments and suggestions, answering questions	Conducting public participation meeting, publishing information about project activities	Project Affected Parties	Contractor, Supervision Consultant, Kayseri KASKİ
	During the construction phase	Informing about the 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, Supervision Consultant, Kayseri KASKİ
	During the construction phase	Informing about 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, Supervision Consultant, Kayseri KASKİ
Operation	During the operation phase	Informing about the project activities	Announcements to be published on the websites and social media accounts of the relevant public institutions	All stakeholder categories	Kayseri KASKİ

KASKİ will make the subproject E&S documents available in both Turkish and English on its website¹. These documents can also be accessed at the KASKİ office and Kocasinan District Municipality. Furthermore, project posters and information on the grievance mechanism will be displayed at local points, including the Mukhtar's Office in Boğazköprü Neighborhood. Stakeholder consultations will be conducted to review the draft E&S documents before they are finalized and disclosed. This process ensures that stakeholders insights and concerns are valued and integrated, fostering a more effective and inclusive outcome.

¹ <https://www.kaski.gov.tr/>

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1. Project Implementation Unit (PIU)

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 KASKI. 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 Entity	Responsibilities	Activities
PMU of ILBANK	Monitor and control whether KASKI fulfills its responsibilities;	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Conducting stakeholder engagement activities in close co-operation with ILBANK Project Management Unit • Management and resolution of complaints; • 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	<ul style="list-style-type: none"> • Review the SEP document to redefine the stakeholders directly or indirectly affected and/or interested in the 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 Project, • Interacts with various stakeholders to get their views on SEP implementation,

Responsible Entity	Responsibilities	Activities
		<ul style="list-style-type: none"> • 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 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.
Contractor	<ul style="list-style-type: none"> • To inform ILBANK on all matters related to relations with stakeholders; • To communicate and resolve complaints arising from construction activities in close and co-operation with ILBANK 	<ul style="list-style-type: none"> • 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 complaints arising from construction activities 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 Municipality 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 KASKI to receive, resolve and follow up the concerns and grievances of sub-project affected communities. KASKI 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 complaints 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 should be 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. KASKI 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 scheme is presented in table 5:

Table 5: The operational flow chart of the Grievance Mechanism

Grievance Process	Requirement / Action
Submitting the grievance	Receiving the grievance by any communication channel explained in SEP. (At this point, if the complaint is a sensitive complaint involving child abuse, sexual harassment or Gender Based Violence (GBV), immediate action will be taken within 2 days of receipt of the complaint. In cases of sexual abuse and harassment or potential child abuse at sub-project sites, the complaint 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 the grievance	The sample complaint will be registered by making an entry in the registration table. All complaints will be logged and feedback given to the complainant within two working days. If the complainant requests that this complaint be handled anonymously, the complaint will be logged anonymously and this request will be honoured.
Referring the grievance	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 the grievance	Assessment of complaints within 10 working days and determination of whether the complaint meets the admissibility criteria.

Responding to the grievance	<p>If the complaint is valid, corrective measures to resolve the complaint are determined and taken within 15 working days at the latest. If the resolution of the complaint will take longer, a partial response should be given to the complainant and the Grievance Closure Form should be completed.</p> <p>All comments and complaints will be responded to verbally or in writing in line with the communication method preferably specified by the complainant, if contact information is provided.</p> <p>At this point, it should be noted that the action and result taken for the anonymously recorded complaint should be shared on KASKI's website so that the anonymous complainant can be informed about the complaint and results.</p>
Recording the outcome of the grievance	Processing of the grievance result in the registration table
Right to object	<p>If the complaint cannot be resolved through the current process, applicants can always appeal to the relevant legal authorities. These institutions can be summarised as follows:</p> <ul style="list-style-type: none"> - 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 complaints 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](tel:+903524320432)

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

6.2. Grievance Mechanism at National Level

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 ve 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 complaints system called the Presidential Communication Centre (CİMER). People from all walks of life and professions have developed the habit of writing letters of complaint to CİMER by e-mail. Therefore, this system should be added to institutional grievance mechanisms. Operating under the Presidential Directorate of Communication, CİMER 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 complaint mechanism established for foreigners in Turkey 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, Labor Management Plan (LMP) and Grievance Mechanism Procedure. Sub-project workers will be able to raise workplace issues such as unsafe or unhealthy 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 notes.

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 accessible locations 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 wish. The grievance mechanism for workers guarantees that complaints will be investigated impartially and that there will be no retaliation against workers who file complaints. Workers' grievances will be kept in the grievance database.

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 subproject is an important tool to record and chase subproject activities in compliance with ILBANK ESMS, 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
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 supervision 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
- Number of formal and informal meetings with Disadvantaged/Vulnerable Groups
- 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 complaints in total and at local level
- Number of grievances received from stakeholders, sorted and analysed by category
- Number of complaints that were (i) opened (ii) open for more than 15 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 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 PROJECT GRIEVANCE FORM	
Person Filling Out the Form:		Date and time:	
Interview Agenda:		Reference No: KASKI-Project Code-0001-2..	
1. INFORMATION ABOUT THE COMPLAINANT			
Name surname: <i>If the complainant requests that this grievance be treated anonymously, this grievance will be recorded anonymously and the request will be met.</i>		How received the Grievance:	
TC Identification number:		Telephone / Toll Free Li <input type="checkbox"/>	
Telephone:		Face to Face Meeting <input type="checkbox"/>	
Address:		Website / Email <input type="checkbox"/>	
Email:		Other (Explain) <input type="checkbox"/>	
Stakeholder Type			
Public <input type="checkbox"/>	PAP <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Trade Association <input type="checkbox"/> NGO <input type="checkbox"/>
Interest Group <input type="checkbox"/>	Industrial Assosiaction <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/> University <input type="checkbox"/>
2. DETAILED INFORMATION ABOUT THE GRIEVANCE			
Description of the grievance:			
Solution method requested by the complainant			

Registrant Name Surname/Signature	Complainant Name Surname/Signature
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Annex-B Sample Grievance Closure Form

	KASKI	
	SOLAR POWER PLANT PROJECT	
GRIEVANCE CLOSE OUT FORM		
Reference form:		
1. DETERMINATION OF CORRECTIVE ACTION		
1		
2		<input type="checkbox"/>
3		<input type="checkbox"/>
4		<input type="checkbox"/>
5		<input type="checkbox"/>
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 Grievance/Date		Name Surname / Signature of Complainant/Date

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

		KASKI	
		SOLAR POWER PLANT PROJECT	
		CONSULTATION FORM	
Person Filling Out the Form:		Date timeand place:	
Meeting Agenda:		Interview Registration Number:	
1. INTERVIEW INFORMATION			
Interviewed Institution:		Form of Communication	
Name and Surname of the Interviewee:		Telephone / Toll Free Li <input type="checkbox"/>	
Telephone:		Face to Face Meeting <input type="checkbox"/>	
Address:		Website / Email <input type="checkbox"/>	
Email:		Other (Explain) <input type="checkbox"/>	
Stakeholder Type			
State agency <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Job Room <input type="checkbox"/> NGO <input type="checkbox"/>
Interest Group <input type="checkbox"/>	Industrial Union <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/> University <input type="checkbox"/>
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-D Sample Grievance Log Form

[illegible]