

**SUSTAINABLE CITIES PROJECT-II Additional Financing**

**CONSTRUCTION OF YERKÖY (YOZGAT) ADDITIONAL WATER SUPPLY AND SEWERAGE SYSTEM COMPONENTS PROJECT**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**CONSTRUCTION OF YERKÖY (YOZGAT) ADDITIONAL WATER SUPPLY AND SEWERAGE SYSTEM COMPONENTS PROJECT**

STAKEHOLDER ENGAGEMENT PLAN

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**TABLE OF CONTENTS**

**Page**

*Table of Contents i*

*List of Tables ii*

*List of Figures ii*

*List of Abbreviations iii*

[EXECUTIVE SUMMARY 1](#_Toc201321616)

[1 INTRODUCTION 4](#_Toc201321617)

[2 ABOUT PROJECT 7](#_Toc201321618)

[2.1 Purpose and Requirements of the Project 9](#_Toc201321619)

[2.2 Project Location 9](#_Toc201321620)

[2.3 Roles and Responsibilities 12](#_Toc201321621)

[2.4 Project Organizational Management 13](#_Toc201321622)

[3 REGULATORY REQUIREMENTS 17](#_Toc201321623)

[3.1 National Legal Framework 17](#_Toc201321624)

[3.2 International Standards 18](#_Toc201321625)

[3.3 Major Gaps between the Turkish EIA Regulation and WB OP 4.01 22](#_Toc201321626)

[4 PROJECT STAKEHOLDERS 24](#_Toc201321627)

[4.1 Stakeholder Engagement Program and Tools 26](#_Toc201321628)

[4.2 Previous Stakeholder Consultation 29](#_Toc201321629)

[4.3 Future Stakeholder Engagement 31](#_Toc201321630)

[5 GRIEVANCE MECHANISM 34](#_Toc201321631)

[5.1 Grievance Register 39](#_Toc201321632)

[5.2 Public Grievance Mechanism 40](#_Toc201321633)

[5.3 Worker Grievance Mechanism 41](#_Toc201321634)

[6 MONITORING AND REPORTING 44](#_Toc201321635)

[REFERENCES 47](#_Toc201321636)

[**APPENDIX – A Exclusion Letter** 48](#_Toc201321637)

[**APPENDIX – B Sample Consultation Form** 49](#_Toc201321638)

[**APPENDIX – C Sample Grievance Form** 50](#_Toc201321639)

[**APPENDIX – D Sample Grievance Closure Form** 51](#_Toc201321640)

[**APPENDIX – E Grievance Register** 52](#_Toc201321641)

**LIST OF TABLES**

Page

[Table 2‑1. Data on the Population in the Project AoI 7](#_Toc201321673)

[**Table 2‑2.** Project Organizational Management 13](#_Toc201321674)

[**Table 3‑1.**  Specific Objectives of National EIA Regulation of Türkiye 17](#_Toc201321675)

[**Table 3‑2.**  Major Gaps between Turkish EIA Regulation and WB OP’s 22](#_Toc201321676)

[Table 4‑1. Stakeholder Groups 24](#_Toc201321677)

[Table 4‑2. Project Stakeholder Needs 26](#_Toc201321678)

[**Table 4‑3.** Consultation and Information Disclosure Strategy 28](#_Toc201321679)

[**Table 4‑4.** Vulnerable/Disadvantaged Individuals/Groups in the Project Area 30](#_Toc201321680)

[Table 4‑5. Sample Table for Stakeholder Engagement Log 32](#_Toc201321681)

[Table 5‑1. Public Grievance Mechanism 40](#_Toc201321682)

[Table 5‑2. Worker Grievance Mechanism 42](#_Toc201321683)

[Table 6‑1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement 45](#_Toc201321684)

**LIST OF FIGURES**

[Figure 2‑1. Project Location and Area of Influence 11](#_Toc138238547)

[Figure 2‑2. Organizational Chart of Project Owner 12](#_Toc138238548)

[Figure 2‑3. Organizational Chart of Project Implementation Unit 13](#_Toc138238549)

**LIST OF ABBREVIATIONS**

|  |  |
| --- | --- |
| AF | Additional Finance |
| AoI | Area of Influence |
| CİMER | Presidency’s Communication Centre |
| EBRD | European Bank for Reconstruction and Development |
| EHS | Environmental Health and Safety |
| EIA | Environmental Impact Assessment |
| ESMF | Environmental and Social Management Framework |
| ESMP | Environmental and Social Management Plan |
| ESMR | Environmental and Social Monitoring Reports |
| EU | European Union |
| GBV | Gender Based Violence |
| GM | Grievance Mechanism |
| HRS | Human Resources Specialist |
| IFC | International Finance Corporation |
| ILBANK | İller Bankası A.Ş. |
| KPI | Key Performance Indicators |
| MoEUCC | Ministry of Environment Urbanization and Climate Change |
| OHS | Occupational Health and Safety |
| OP | Operational Policy |
| PIF | Project Introduction File |
| PIU | Project Implementation Unit |
| SCP-II | Sustainable Cities Project-II |
| SEA/SH | Sexual Exploitation and Abuse/Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| TurkStat | Turkish Statistical Institute |
| WB | World Bank |
| WBG | World Bank Group |
| YİMER | Foreigners Communication Centre |

# EXECUTIVE SUMMARY

İller Bankası A.Ş. (ILBANK) receives technical and financial support from the World Bank (WB) and the European Union (EU) to develop planning capacity and access to selected municipal services in participating municipalities and public services. ILBANK is the implementing agency of the project, acting as a financial intermediary (Borrower); while the Project Owner is the Yerköy Municipality and 2U1K Mühendislik ve Danışmanlık A.Ş. (2U1K) is the Environmental and Social (E&S) Consultant performing the E&S impact and risk assessment studies on behalf of Yerköy Municipality.

SCP II - Additional Financing (AF) is established as an additional support mechanism for meeting the increasing demand from Municipalities for investments in sustainable urban development that has been ongoing under the SCP.

Construction of Yerköy (Yozgat) Additional Water Supply and Sewerage System Components Project is financed within the scope of Sustainable Cities Project-II Additional Financing (SCP-II AF). According to the interviews conducted by 2U1K with the headmen of Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods of Yerköy Municipality that are all in the project area, the residents have complaints about lack of water supply and insufficient sewerage systems. In this context, this project has been developed through SCP-II AF for increasing the capacity of water supply and sewerage systems in Yerköy District of Yozgat Province. It is expected that the construction phase will continue for 18 months.

The components of the Project are as follows:

1. Component 1 - Yerköy (Yozgat) Additional Drinking Water Supply System Project - it includes the renewal of 5 km drinking water network lines (including house connections, valves, hydrants) and replacement of water tanks (3,000 m³) (including water tank connection line) to serve Kale neighbourhood;
2. Component 2 - Yerköy (Yozgat) Additional Sewerage System Project - it includes the renewal of 26.4 km sewerage network lines (including auxiliary structures like control manholes, parcel manholes and connections) to serve Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods.

Network lines will be constructed under the main roads of the Yerköy District. Therefore, there will be no land acquisition for the network lines. On the other hand, "Çamlık Tepesi", where the existing water tanks will be replaced with higher volume tanks, is an existing land owned by Yerköy Municipality. In “Çamlık Tepesi”, a municipal staff and his family are residing. The staff is responsible for the security of the municipality owned land. Also, the family-owned poultry animals are observed around the house. Therefore, no land acquisition will be of concern for the water tanks. Moreover, there is no informal user on the land.

Yerköy Municipality requested the evaluation of the Project from the Provincial Directorate Environment, Urbanization and Climate Change within the scope of the EIA Regulation published in the Official Gazette dated July 29, 2022 and numbered 31907 and the activities under this Project are not included in Annex-I and Annex-II of the EIA Regulation. Thus, the Project was evaluated as out of scope in and the related Exclusion Letter granted by the Provincial Directorate Environment, Urbanization and Climate Change is presented in Appendix-A.

As per WB Operational Policy (OP) 4.01 - Environmental Assessment, projects are classified in categories A, B or C depending on the severity of their potential impacts on the environment. The Project is specified as Category B, which results in environmental and/or social impacts that are specific to the location of the facility and/or with impacts/risks that could be easily identify and prevented.

SEP is prepared in accordance with WB Safeguard Policies, including the Operational Policies (OPs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines, ILBANK’s Environmental and Social Management Framework (ESMF) and the national legislation in force in Türkiye. The following WB OPs are triggered by the Project:

* WB OP Environmental Assessment (OP 4.01),
* WB OP Physical Cultural Resources (OP 4.11).

The critical and natural habitats are examined within the scope of the WB OP 4.04 on natural habitats and there is no critical and natural habitat within the immediate surroundings of the project area. There is also no environmental protection zones in the Project Area. The potential impacts and mitigation measures are prepared in case of discovering new critical and natural habitat or environmental protection zones by carrying out literature and surface studies as a requirement of the WB OP 4.11 on Physical Cultural Resources. WB OP 4.12 Involuntary Resettlement does not apply to this project as there is no land acquisition, involuntary resettlement, restriction on land use, or access to land or natural resources.

Within the scope of the project, there are no associated facilities such as roads, energy transmission lines, etc. Since there is no associated facilities such as roads, energy transmission lines, etc., no major impact is expected besides dust and traffic density increment during the construction phase. Besides, in operation phase, if it is necessary there will be maintenance and repair works in additional water supply and sewerage system. Same as construction phase, since there is no associated facilities such as roads, energy transmission lines, etc., no major impact is expected besides dust and traffic density increment during the operation phase. Since the construction works for the Project will be carried out in neighbourhoods, it is foreseen that no construction camp site with accommodation will be established for the employees.

This Stakeholder Engagement Plan (SEP) is prepared by 2U1K Engineering and Consultancy Inc. in the scope of the environmental and social impact and risk assessment studies conducted for the Project in accordance with WB Safeguard Policies, including the Operational Policies (OPs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines, ILBANK’s Environmental and Social Management Framework (ESMF) and the national legislation in force in Türkiye.

# INTRODUCTION

This Plan presents the Stakeholder Engagement Plan (SEP) for the ‘Construction of Yerköy (Yozgat) Additional Water Supply and Sewerage System Components Project’ (hereinafter referred to as 'Project') and has been prepared by 2U1K Mühendislik ve Danışmanlık A.Ş. (2U1K) on behalf of “Yerköy Municipality” (hereinafter referred to as 'Project Owner') within the scope of SCP-II AF.

The Project aims to meet infrastructural needs of Yerköy District in terms of water supply and sewerage systems:

1. Component 1 - Yerköy (Yozgat) Additional Drinking Water Supply System Project - it includes the renewal of 5 km drinking water network lines (including house connections, valves, hydrants) and replacement of water tanks (3,000 m³) (including water tank connection line) to serve Kale neighbourhood;
2. Component 2 - Yerköy (Yozgat) Additional Sewerage System Project - it includes the renewal of 26.4 km sewerage network lines (including auxiliary structures like control manholes, parcel manholes and connections) to serve Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods.

The general objective of the proposed project is to support Yerköy Municipality to better respond to significant increase in demands for municipal services in terms of water supply and sewerage systems that has risen from the insufficiency of the existing infrastructure. Another reason is to protect the integrity of the previous water network projects performed by ILBANK, European Investment Bank (EIB) and State Hydraulic Works (DSI).

Water supply sources of Yerköy District will be sufficient till the project horizon after decreasing the water losses in the water supply system with the help of the proposed measures in water supply system.

Also, all structures will have general maintenance requirements (network, wells, water tank) till project horizon. These will be maintained and renewed by Municipality regularly till the design horizon.

Wastewater collected in the district is treated at “Çiçekdağı, Köseli, Yerköy Group Wastewater Treatment Plant”, which was commissioned in 2015.

A loan application was lodged to ILBANK[[1]](#footnote-2) to put the project into practice. The World Bank (WB), acting as the Project financer, authorized ILBANK as the Borrower and the Project coordinator. Subsequent to the tender process held by ILBANK, 2U1K was commissioned for the E&S impact and risk assessment studies for this Project and an Environmental and Social Management Plan (ESMP) and this Stakeholder Engagement Plan (SEP) were prepared for the Project by 2U1K. During the project implementation, necessary measures will be taken in consideration of the environmental and social impacts/risks provided in the ESMP.

The Project will be implemented under SCP-II AF, in accordance with the legislation of the Republic of Türkiye and the Safeguard Policies of WB (as the primary financier).

The purpose of the Stakeholder Engagement Plan is to guide the Project Owner to:

* Build and maintain a constructive relationship with the stakeholders, especially affected communities;
* Promote improved environmental and social performance through effective engagement with the stakeholders;
* Promote and provide means for adequate engagement with affected communities and to ensure that meaningful environmental and social information is disclosed to such communities and to other stakeholders;
* Ensure that all stakeholders have ways to access information and raise issues; and
* Ensure that project-affected communities have accessible means to raise issues and grievances, and the Project Owner responds to and manage such issues and grievances appropriately.

This SEP includes (i) the identification of stakeholders for the Project, (ii) analysis of relationships of the stakeholders with the Project, (iii) details of consultation methodologies, (iv) activities carried out to-date and those planned for the future of the Project, (v) details of the process for managing stakeholders’ concerns and grievances and explains how the stakeholder engagement process will be recorded, monitored, evaluated and reported.

The Project Owner is committed to implement this SEP throughout all phases of the Project. The SEP is prepared in compliance with WB Safeguard Policies, including OPs, Environmental and Social Management Framework (ESMF) of SCP-II AF and Turkish legislation. The SEP is a living document, and it will be regularly monitored, reviewed and updated by the Project Owner.

# ABOUT PROJECT

The Project aims to increase the capacity of the water supply and sewerage systems of Yerköy District. The Project will serve Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods of Yerköy Municipality. The Project Owner is Yerköy Municipality, which provides services to 12 neighbourhoods (TurkStat Population Report, 2018). According to Turkish Statistical Institute, Yerköy District has a total population of 34.888 consisting of 17.204 males and 17.684 females. Demographic information of neighbourhoods that will be affected by the Project is given in the Table 2‑1.

Table 2‑1. Data on the Population in the Project AoI

|  |  |  |  |
| --- | --- | --- | --- |
| **Settlement** | **Female (2021)** | **Male (2021)** | **Total Population**  **(2021)** |
| **Hüyük Neighborhood** | 980 | 942 | 1.922 |
| **Gültepe Neighborhood** | 1.199 | 1.095 | 2.294 |
| **Karacaşar Neighborhood** | 473 | 444 | 917 |
| **Ali Galip Gençoğlu Neighborhood** | 106 | 125 | 231 |
| **Erzurum Neighborhood** | 1.235 | 1.156 | 2.391 |
| **Kale Neighborhood** | 463 | 448 | 911 |

(Turkish Statistical Institute, 2022)

Erzurum Neighbourhood is the most crowded neighbourhood of Yerköy District.

The scope of the project includes the renewal of 26.4 km sewerage network lines and renewal of 5 km drinking water network lines of Yerköy District and also the replacement of water tanks with a capacity of 3,000 m³, together with the water tank connection line. On the other hand, within the project site, there is an existing land, which is called “Çamlık Tepesi” and owned by Yerköy Municipality. During the construction phase, excavation works will be carried out in "Çamlık Tepesi” and water tanks will be replaced. The land covers an area of 232,896.59 m². According to site visit, there are water tanks and various hardware, which belong to the municipality. A municipality staff and his family live nearby the water tanks. The construction works will continue in such a way that the family here will be affected at the minimum level. “Çamlık Tepesi” is also secured by this Municipality staff since water tanks and various hardware are placed there. Also, there is no informal user, outstanding claim, and squatters on the land.

Within the scope of the project, there is no associated facility, road, etc.

The Project will provide temporary employment opportunities during the construction phase. A definite construction plan has not yet been developed by the Project Owner. Approximately 50 people are expected to be employed. No temporary or permanent employment opportunities are expected to be provided during the operation phase as maintenance and repair works will be carried out by existing municipal staff. Since the construction works for the Project will be carried out in a neighbourhoods, it is foreseen that no construction camp site with accommodation will be established for the employees. However, containers can be placed on the project site for those who will work on the project to rest, eat and also for sanitary facilities. These containers will provide the worker accommodation conditions prepared by the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD) and approved by the WB.

Yerköy Municipality requested the evaluation of the Project from the Provincial Directorate Environment, Urbanization and Climate Change within the scope of the EIA Regulation published in the Official Gazette dated July 29, 2022, and numbered 31907 and the activities under this Project are not included in Annex-I and Annex-II of the EIA Regulation. Thus, the Project was evaluated as out of scope and the related Exclusion Letter granted by the Provincial Directorate Environment, Urbanization and Climate Change is presented in Appendix-A. On the other hand, as per WB O.P. 4.01, the Project is classified as Category B Project, resulting environmental and/or social impacts that are specific to the location of the facility and/or with impacts that could be easily identified and prevented.

Yerköy Municipality will be the owner of the project components after construction and Directorate of Water and Sewerage Works of Yerköy Municipality will be responsible for operation, repair and maintenance of the entire system. During operation phase, operator team assigned by Yerköy Municipality will ensure the compliance with regulations in terms of drinking water parameters, the sewerage system and compliance of wastewater discharge parameters.

It is expected that the construction phase of the Project will last for 18 months.

Within the scope of SCP-II AF, OPs 4.01, 4.04, 4.11, 4.12 are taken into consideration. The critical and natural habitats are examined within the scope of the WB OP 4.04 on Natural Habitats and there is no critical and natural habitat within the immediate surroundings of the project area. In order to evaluate the physical cultural resources, construction area and its surroundings were evaluated as a requirement of OP 4.11 and no cultural assets were determined. If any cultural asset to be protected is found during the activities in the area, the nearest Museum Directorate or Civil Administrative Authority should be notified in accordance with the provision of Article 4 of the Law No. 2863 titled Notification Obligation.

All works to be carried out under the Project will be on the land owned by the municipality; therefore, there is no land acquisition that will trigger WB OP 4.12 on Involuntary Resettlement.

## Purpose and Requirements of the Project

On August 16, 2022, 2U1K E&S experts conducted a site visit to see the project site and to gather information about the project from the Project Owner. Afterwards, on October 26, 2022, interviews were made with headmen of Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods via phone calls. In these interviews, detailed information was obtained about cultural heritage, traffic and transportation, demographics and population, livelihoods and employment, education, health, vulnerable/disadvantaged individuals/groups, infrastructure and services, land acquisition, level of information about the project.

In addition, according to interviews held with headmen of Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods, residents are experiencing water supply problems for their daily usage and irrigational purposes. Especially, to afford the water from private resources is challenging for residents. Hence, this Project is planned by Yerköy Municipality (the Project Owner) to answer residents of these neighborhoods' needs and improve services about sewerage system, water supply for daily use and irrigational purposes.

## Project Location

Since the Project is a network construction for the water supply and sewerage system, there will be no single place to be focused. The construction works will be carried out in Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods of Yerköy District in Yozgat Province. There will be no land acquisition as part of the Project. Similarly, there will be no physical and/or economic displacement within the scope of the Project. Moreover, there are no sensitive areas such as important environmental protection zones, critical natural habitats, natural habitats, etc.

Based on the environmental, social, and community health and safety impacts that will occur during the construction phase of the Project, the area of influence (AoI) of the Project has been determined as 200 m based on the expert opinion of 2U1K. The reason behind this expert opinion is that during the construction phase of the project, the works will be carried out on the roads passing through the neighborhoods. Aol was determined as 200 meters by covering 100 meters right and 100 meters left of the relevant roads. Therefore, in this context, Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale neighbourhoods are identified as the settlements within AoI during the construction phase, while the Project will serve the entire city during the operation phase. The lines to be constructed within the scope of the project are given in Figure 2‑1.

Map

Description automatically generated

Figure 2‑1. Project Location and Area of Influence

## Roles and Responsibilities

The Project is executed by a group of Deputy Mayor (financial operations), Chief Editor, Urban Planning Director, Financial Services Departments, Directorate of Technical Works and Directorate for Human Resources etc. under the coordination of Mayor of Yerköy District. The organizational chart of the Project Owner is presented in Figure 2‑2.

Figure 2‑2. Organizational Chart of Project Owner

The Project Owner, in collaboration with relevant third parties, will establish, maintain and promote, as required, a Project-specific organizational structure that defines the roles, responsibilities and authority for the implementation of the ESMP and SEP as provided as a model in Figure 2‑3. Specific personnel with clear boundaries of responsibility and authority should be appointed, including the management representatives. The project-specific organizational structure to be developed will include executives, who will coordinate and manage the Project, the technical and financial experts, who will be in charge of the construction and operational phases of the Project, and at least one Social Expert, one Environmental Expert and one Occupational Health and Safety (OHS) Expert. Core environmental and social responsibilities should be well defined and communicated to the relevant personnel and the rest of the Project Implementation Unit. Additionally, personnel should have adequate knowledge, skills and experience to competently and efficiently take specific measures and actions required under the ESMP.

Figure 2‑3. Organizational Chart of Project Implementation Unit

## Project Organizational Management

The Project will be awarded to a Contractor by the tender, which will be lodged by the Project Owner and supervised by ILBANK in accordance with WB Procurement Regulations and Public Procurement Law. On the other hand, 2U1K is the E&S Consultant executing the environmental and social impact and risk assessment studies. The roles and responsibilities of the responsible parties in the project organizational management are provided in Table 2‑2.

**Table 2‑2.** Project Organizational Management

| **Responsible Party** | **Terms of Reference** |
| --- | --- |
| Project Owner | * The Project Owner is the implementer and beneficiary of this Project. * The Project Owner will be responsible for providing technical and data support during the supervision of contractors and the preparation of technical and financial feasibility reports regarding projects. * The Project Owner will be responsible for preparing the bid documents during the implementation, conducting bidding processes in accordance with the statute of the Public Procurement Authority, and the legal requirements of the WB, following the Construction Contract and cooperating with ILBANK for the supervision of construction activities. * The Project Owner will check both the technical and administrative progress of contract packages and the implementation of the points provided in ESMP and SEP on site together with Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and full time OHS Expert) who will be involved in the Project Organizational Chart. * In addition to on-site inspections, the Project Owner will review the Environmental and Social Monitoring Reports (ESMRs) to be submitted by contractors on a monthly basis and will submit these reports to ILBANK quarterly after being reviewed. |
| E&S Consultant | * Preparing the Environmental and Social Assessment Study Reports, i.e., ESMP and SEP, for the approval of ILBANK and WB; * Taking a part in organizing the ESMP introduction meeting to be held for the public and NGOs as part of the project; and * Finalizing the reports as per the concerns/opinions of the stakeholders. |
| Supervisory Consultant/  Advisor | The Project Owner will select a Supervisory Consultant via tender process having a range of specialties to inspect the contractor's activities on a daily basis. Apart from the guidance to the given to the Project Owner about WB OPs and also the public consultation and announcement requirements and the project documents in compliance with WB requirements, the Supervisory Consultant will appoint the personnel given below:   * The **Supervisory Contract Manager** will be responsible for inspecting the contractor to ensure that the recommendations and requirements given in the Project disclosure package are fulfilled. They will be responsible for continuously monitoring processes and actions undertaken by the contractor and for identifying the measures to be taken by the contractor to deal with any areas of non-conformity. At the same time, they check whether the necessary training is given to the personnel who will work during the construction phase. This includes periodic audits, inspections and/or on-site checks of project areas or worksites and/or records and reports compiled by contractors. * The **Environmental Expert** will be responsible for supervising the implementation of all environmental and biodiversity measures provided in the Project disclosure package and for reporting to the Project Owner regularly. The environmental expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). * The full time Occupational **Health and Safety Expert** will be responsible for supervising the health and safety measures throughout the project activities. OHS Expert should be certified for recognized international safety competency. Graduation from a university or a similar institution in the relevant discipline would be an asset. If the consultation process coincides with the Covid-19 pandemic period, it monitors and oversees the consultation process to ensure that it is managed with additional measures in line with the government restrictions applicable for the relevant period. It makes necessary adjustments according to the " Interim Advice for IFC Clients on Safe Stakeholder Engagement in The Context of Covid-19" published by IFC on May 15, 2020. * The **Social/Human Resources Expert** will be responsible for supervising the implementation of community health and safety and social measures provided in the ESMP, as well as the implementation of SEP, and for reporting to the Project Owner regularly. Manages the Grievance Mechanism (GM) and regularly monitors the reporting of grievances to the Project Owner. It follows the penalties arising from the contract, checks the suitability of the work done by the Contractor, gives warnings and directions, and notifies ILBANK and the Project Owner in a timely manner, if necessary. Participates in stakeholder engagement activities. The expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). |
| Contractor | * The construction works under the contract packages included in the scope of the ESMP will be carried out by contractors. * Contractors will be responsible for observing the liabilities provided in the ESMP. Issues related to the implementation of the ESMP will be examined by the contractor during the preparation of the bid, and proposals will be submitted considering the ESMP prepared by the Contracting Authority. * The ESMP includes the monitoring tables that describe the possible negative effects of the operations to be carried out during the construction phase of the project and the measures to be taken to minimize these effects and the conditions for putting these measures into action. Additionally, the said tables include the entities and organizations (project stakeholders) responsible for the aforementioned items. * During the construction phase, the contractor will provide training to the personnel who will take part in the project, including the measures within the scope of ESMP, to raise awareness of environmental, occupational and worker health and safety, public health and safety and social issues. * The Contractor will prepare a training program for the personnel on the requirements of the project and the mitigation methods to be applied (including the plans and procedures) and will train all its personnel. The project owner will make sure that the trainings are given. The consultant will check the suitability of the training provided and the adequacy of the training program. * As part of ESMP, implementation of the measures identified for the construction phase will be coordinated by Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and OHS Expert) who will be involved in the Project Organizational Chart. The said experts will be responsible for taking actions required to eliminate/minimize environmental and social impacts/risks in line with ESMP and for putting monitoring plans into practice. * Contractor will prepare monthly ESMRs and submit them to the Project Owner together with Grievance Register. * In case of contingencies such as environmental, social and labour issues or accident or loss of time, the contractor will immediately inform the Project owner and the Project owner will inform ILBANK within 24 hours. A report on the root causes of the incident and the corrective actions to be taken will be submitted to ILBANK and the WB within fifteen (15) days. |
| World Bank and  ILBANK | * During the construction and operation phases, the officials from ILBANK and the WB will audit the Project Owner's performance regarding compliance with the provisions set out in the ESMP managed by the Project Owner. * In this respect, contractors will submit monthly ESMRs to the Project Owner, and the Project Owner will present quarterly ESMRs to ILBANK together with the Grievance Register. * ILBANK will review the documents related to the environmental and social assessment of the project, provide comments to consultants, and giving official approval to these documents and procedures in accordance with the WB safeguards requirements, * ILBANK will perform an overall quality assurance function that the EA documents prepared meet WB requirements, * Regarding the works and reporting activities, ILBANK International Relations Department will be informed through the monitoring reports prepared by the Project Owner. * ILBANK, on the other hand, will inform the WB via ESMRs every three (3) months together with Project Progress Reports. In addition to this information, WB will audit the Project activities and progress through on-site inspections that will be conducted by the WB biannually. * ILBANK will make its own supervision and monitoring along with the information obtained from the Municipality through its Supervision Consultant E&S team’s reports. * ILBANK will guide public participation, consultation and announcement requirements, and project documents in compliance with the WB requirements. * ILBANK will guide the Project Owner about WB OPs. * WB will visit project sites on occasion, and as required, as part of project supervision. * WB will control whether the necessary trainings are given to the personnel who will work during the construction phase |

*Source: ILBANK Sustainable Cities Project -II Additional Financing Environmental and Social* *Management Framework*

# REGULATORY REQUIREMENTS

This section outlines the regulatory framework for the project stakeholder engagement activities, according to national and international requirements.

## National Legal Framework

The Environmental Law No. 2872, which was published in the Turkish Official Gazette No. 18132 dated 11 August 1983 and amended in the Official Gazette dated 29 May 2013 (by Law No. 6486), establishes the underlying legal framework of the environmental legislation in Türkiye and is supported by a large number of regulations. Article 10 of the Environmental Law constitutes the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 31907 dated 29 July 2022.

Within the scope of EIA, for the projects included in the Annex-I list, a stakeholder engagement plan is prepared and a public information and participation meeting will be organized by the bodies and organizations authorized by the Ministry with the participation of the project owner on the date set by the Ministry and at the place and time determined by the Governor's Office before the Committee determines the scope to inform the public about the investment and to hear their opinions and suggestions regarding the project.

Specific Objectives of national EIA Regulation according to regulation is presented in Table 3‑1.

**Table 3‑1.**  Specific Objectives of National EIA Regulation of Türkiye

|  |
| --- |
| 1. In order to inform the public about the investment and to receive their opinions and suggestions regarding the project; a public information and participation meeting shall be organized with the participation of the institutions/organizations qualified by the Ministry and the project owner on the date determined by the Ministry at a central place and time determined by the provincial directorate where the relevant public, which is expected to be most affected by the project, can easily reach. 2. The institutions/organizations authorized by the Ministry shall have an announcement indicating the date, time, place and subject of the meeting published at least 10 calendar days before the date of the meeting in a local periodical published in the region where the project will be realized and in a newspaper defined as a common periodical. 3. The public information and participation meeting shall be held under the chairmanship of the provincial director or an authorized person to be assigned by him. At the meeting, the public is informed about the project and their opinions, suggestions and questions are received. The opinions, suggestions and objections expressed by the public shall be stated in the minutes of the meeting. The chairman of the meeting may ask the participants to submit their opinions in writing. The minutes of the meeting shall be sent to the Ministry with a copy to be kept by the Provincial Directorate. 4. Commission members may inspect the area where the project is planned and attend the public information and participation meeting to be held on the notified date before determining the special format. 5. A stakeholder engagement plan (SEP) is prepared by the institutions/organizations authorized by the Ministry in order to inform the public about the project and its impacts and to receive their opinions and suggestions regarding the project. The prepared stakeholder engagement plan is submitted as an appendix to the EIA application file. When deemed necessary, the Ministry may ask the institutions/organizations that have been granted competence to carry out additional studies such as distributing informative brochures, conducting surveys, seminars, or preparing a website about the project and sharing information during the EIA process to inform the public. In addition, if requested by the Ministry, this plan shall be updated during the EIA process. |

Environmental Impact Assessment (EIA) encompasses the identification of potential positive and negative effects of the planned projects on the environment, the measures to be taken to avoid adverse effects or minimize them to a degree not harmful to the environment, the determination and assessment of the selected location and technology alternatives, and the efforts to be maintained for the monitoring and control of the implementation of projects. The project has been evaluated within this scope, and the activities of the Project are not included in Annex-I and Annex-II according to Turkish repealed EIA legislation, therefore, it is considered out of scope. The Exclusion Letter is presented in Appendix-A

Apart from environmental laws, the Project Owner is also obliged to follow the following laws:

* Labour Law No. 4857, Official Gazette No. 25134 dated 10 June 2003
* Law on Right of Petition No. 3071, Official Gazette No. 18571 dated 10 November 1984
* Law on the Right to Obtain Information No. 4982, Official Gazette No. 25269 dated 24 October 1984
* Law on Protection of Personal Data No. 6698, Official Gazette No. 29677 dated 07 April 2016.

## International Standards

WB governs projects and activities by the Safeguard Policies to assure that they are conducted in an environmentally, financially and socially sound manner. Safeguard Policies include Environmental Assessments and other policies that define environmental and social adverse effects of the projects as well as their reduction and prevention. These policies are expanded in the “World Bank Operations Manual” that provides further guidance on the OPs and compilation. The following OPs are included within the framework of this ESMP.

**WB OP 4.01 - Environmental Assessment Policy**

The purpose of this policy is;

* To ensure the projects proposed for Bank financing are environmentally and socially sound and sustainable;
* To inform decision-makers about the nature of environmental and social risks; and
* To increase transparency and involvement of decision-makers in the decision-making process.

For the purposes of the WB OP 4.01, projects are classified in categories A, B or C depending on the severity of their potential impacts/risks on the environment:

**Category A projects;** projects with impacts/risks which could potentially result in significant and diverse environmental and/or social impacts/risks and issues in the future (based on type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts) and which could not be easily identified at the time of classification

**Category B projects;** projects with environmental and/or social impacts/risks that are specific to the location of the facility and/or with impacts/risks that could be easily identified and prevented

**Category C projects;** projects resulting in minimum or no environmental and social issues

**FI projects;** financial intermediation activities

Upon assessment, the project category was regarded as Category B.

An ESMP has been prepared by the Project Owner for the investments defined and outlined within the scope of this Project and based on the WB OP.

When preparing the ESMP, the OPs listed below were assessed considering the scope of the project as well as the geographical, natural and demographic structure of the region.

**WB OP 4.04 - Natural Habitats**

* The construction works under the project are not likely to affect critical or non-critical natural habitats.
* Subprojects with a significant impact on a recognized critical habitat or ecosystem will be considered inappropriate for being funded within the scope of OP 4.01, and the key point to be addressed in the EIA study will be identifying the subproject alternatives in terms of location and scope.
* If the potential impact of a subproject on natural habitats is significant or if the impact is on critical natural habitats, the top priority will be to tackle the problem by identifying a new location. If this is not possible, appropriate mitigation measures will be adopted for the relevant circumstances.

**WB OP 4.11 - Physical Cultural Resources**

* In the first step of baseline studies, literature and superficial studies are conducted.
* Based on these studies, potential impacts/risks on these resources and associated mitigation measures are assessed in the EIA/ESIA. However, buried properties (e.g. tombs or mounds) may not be identified during baseline studies due to the nature of physical cultural resources.
* The key point here has two dimensions:
* Identification of “artefacts found by chance” during construction; and
* Potential impact of the project on known cultural values.

**WB OP 4.12 - Involuntary Resettlement**

* Involuntary resettlement may cause severe long-term hardship, impoverishment, and environmental damage unless appropriate measures are carefully planned and carried out.
* For these reasons, the overall objectives of the Bank's policy on involuntary resettlement are the following:
  + Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
  + Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.

The Project has been evaluated according to WB OP 4.12 and no land acquisition is required under the Project.

In addition to the World Bank OPs, there are international policies directly related to the project:

**The World Bank Policy on Access to Information (2010)** sets out the policy of WB on public access to information in its possession.

Principles of Policy are:

* Maximizing access to information;
* Setting out a clear list of exceptions;
* Safeguarding the deliberative process;
* Providing clear procedures for making information available;
* Recognizing requesters’ right to an appeals process.

**BP 17.50 World Bank Public Disclosure Policy**

* Public Disclosure relevant safeguard policies documents should send to the World Bank’s Infoshop.
* Relevant documents should disclose in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs.

**WB Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)**

WB has developed this Good Practice Note to assist project participants in identifying risks of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) – as opposed to all forms of Gender Based Violence (GBV) that can emerge in Investment Project Financing and to advise Borrowers on how to best manage such risks.

## Major Gaps between the Turkish EIA Regulation and WB OP 4.01

The World Bank Group's (WBG) Operational Policies and Environmental, Health and Safety (EHS) Guidelines will be adopted for this project. For this reason, this project will meet the relevant requirements of WBG Safeguard Policies and General EHS Guidelines. If national regulations differ from the levels and measures presented in WBG policies, the more stringent one will apply.

The Turkish EIA procedures are, with some exceptions, in line with the World Bank Policies (see Table 3‑2). The primary exceptions are in project categorization, the scope of environmental and social assessment, and land acquisition, resettlement, and public consultation. In cases where the Turkish legislation differs from the WB Policies, the more stringent one will apply to the implementation of the project.

**Table 3‑2.**  Major Gaps between Turkish EIA Regulation and WB OP’s

| **Steps** | **EIA Regulation** | **World Bank OP 4.01** |
| --- | --- | --- |
| Screening | The EIA Regulation classifies the proposed projects into two categories:  1. Annex-I Projects: Projects with considerable potential impacts, which require an EIA process and EIA Report.  2. Annex-II Projects: Projects with or without considerable potential impacts on the environment. | Within the scope of WB OP 4.01, the proposed projects are classified into three categories:  1. Category A: A proposed project is classified as Category A, if it is likely to have significant adverse environmental and social impacts (depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts). In general, these impacts are major, irreversible, sensitive, variable, cumulative, precedent, and potentially influential over an area broader than the sites and facilities financed under the project.  2. Category B: A proposed project is classified as Category B if its environmental and social impacts are typically site-specific and structurally irreversible and if its impacts are less adverse than those of Category A subprojects and if mitigatory measures can be designed more readily than for Category A subprojects. The projects classified as Category B sometimes vary from the same type of Category A projects only in terms of their scale.  3. Category C: A proposed project is classified as Category C, if it is likely to have minimal or no adverse environmental impacts.  If a project financed by the WB includes a series of sub-projects that are selected by a Financial Intermediary (FI) and financed by the WB loan, the project is classified as Category FI. |
| Public  Participation  Meeting | For the projects included in the list of Annex-I, which therefore require the preparation of an EIA report, stakeholder engagement plan is prepared. The public information and participation meeting, whose place and date is decided by the Provincial Directorate, is held not later than ten (10) days prior to the meeting by disclosing it publicly in local and national newspapers.  No public information and participation meeting is held for the projects included in the list of Annex-II. | For all Category A and B subprojects proposed for WB funding, the borrower will consult and consider the views of the project-affected groups and non-governmental organizations regarding the environmental impacts of the subproject during the EA process. |
| Disclosure | The EIA Report for the projects in the list of Annex-I will be made available to the public opinion at the headquarters of Ministry of Environment, Urbanization and Climate Change (MoEUCC) or provincial directorates. Following MoEUCC's final assessment of the EIA report, the Governor's Office will disclose its reasoned decision publicly.  For the projects in the list of Annex-II, the final Project Introduction File (PIF) will be disclosed publicly at the Provincial Directorates.  A stakeholder engagement plan (SEP) will be prepared by the institutions/ organizations authorized by MoEUCC in order to inform the public about the project and its impacts and to receive their opinions and suggestions regarding the project. | In addition to the points given in the Public Participation section, the Financial Intermediary will make the draft ESIA report prepared in local language for Category A subprojects available at a public place accessible to project-affected groups and local non-governmental organizations (NGOs).  Upon finalization of a Category A subproject ESIA report, the Financial Intermediary will submit an English copy of the final report to the WB together with the English Executive Summary. The Bank will distribute the executive summary to its executive directors and discloses it publicly on an external website.  For Category B subprojects, the Financial Intermediary will submit an English copy of the final version of the Category B EA report to the WB and the WB will disclose it publicly on an external website. |
| *Source: ILBANK "Sustainable Cities Project - II Additional Financing Environmental and Social Management Framework", April 2019* | | |

# PROJECT STAKEHOLDERS

A stakeholder is defined as any individual, organization or group which is potentially affected by the Project, or which has an interest in the Project and its impacts/risks. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - (“project affected parties”) or have an interest in the Project (“other interested parties”).

It is important that particular effort is made to identify any disadvantaged and vulnerable individuals/groups, who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update. The Stakeholder Engagement Plan has been prepared for this project to identify project stakeholders and establish engagement methods for the future of the Project.

Stakeholder identification has been an on-going process and different issues are likely to concern different stakeholders. Therefore, stakeholders have been grouped based on their connections to the Project. Understanding the connections of a stakeholder group to the Project helps identify the key objectives of engagement. Table 4‑1 presents the interested and affected stakeholders, Table 4‑2 presents stakeholders needs within the scope of the Project.

Table 4‑1. Stakeholder Groups

| **Stakeholder Groups** | **Stakeholder Type** | | | | **Identification of stakeholders** |
| --- | --- | --- | --- | --- | --- |
| **Type of Impact** | **Cause of Impact** | **Affected Party** | **Interested Party** |
| **Internal Stakeholders** | | | | |  |
| * Yerköy Municipality Personnel * Contractors and Employees | Direct/Positive Impact | Project Development, Implementation and  Employment | √ |  | Employees who will ensure the realization of the project during construction and operation. |
| **Government / Authorities** | | | | |  |
| * Yerköy Provincial Directorate of Environment, Urbanization and Climate Change * Yozgat Water and sewerage Administration * Yozgat City Health Authority * Directorate General for State Hydraulic Works | Indirect/Positive Impact | Relation of the Project with Healthcare, Environmental and Social institutions during construction and operation phases |  | √ | Local government authorities responsible for health, environment, social services Yozgat province. |
| **Municipality** | | | | |  |
| * Yerköy Municipality | Direct/Positive Impact | Project Development, Implementation and Employment | √ |  | Project owner |
| **Business** | | | | | |
| * Çanakkale Seramik | Direct/ Positive Impact | Construction Phase’s traffic | √ |  | Businesses nearby |
| **Neighbourhood** | | | | |  |
| * Hüyük Neighborhood * Gültepe Neighborhood * Karacaşar Neighborhood * Ali Galip Gençoğlu Neighborhood * Erzurum Neighborhood * Kale Neighborhood | Direct /Negative Impact | Commissioning,  Potential noise and dust emission during the construction phase | √ |  | The area where the potable water and sewerage network will be established and the neighbourhoods where the stakeholders reside |
| **Vulnerable/Disadvantaged Groups** | | | | |  |
| * Households with physically and/or mentally disabled family members * People with chronic disease * Elderly people over 65 years of age who live alone and in need of care | Direct/Negative Impact | Commissioning,  Potential noise and dust emission during the construction phase | √ |  | Stakeholders with the potential for further harm if the project is affected by construction activities. |
| **Associations / Non-Governmental Organizations** | | | | | |
| * Yozgat Human Rights And Freedoms Humanitarian Aid Association * Association Of Interior Eastern Orthopedic Disabilities | Indirect/Positive Impact | Cooperation on the ongoing road works during the construction period of the project in a way that will not leave disabled citizens in a difficult situation | √ |  | NGO’s for people who are considered as vulnerable and with disabled |

Table 4‑2. Project Stakeholder Needs

| **Community** | **Stakeholder group** | **Key characteristics** | **Language needs** | **Preferred notification means (e-mail, phone, radio, letter)** | **Specific needs (accessibility, large print, child care, daytime meetings** |
| --- | --- | --- | --- | --- | --- |
| Internal Stakeholders | * Yerköy Municipality Personnel * Contractors and Employees |  | Turkish | Written information, phone, e-mail, face to face | Be aware of project phases |
| Municipality | * Yerköy Municipality | Management unit | Turkish | Written information, phone, e-mail, face to face | Be aware of project phases |
| Hüyük Neighbourhood  Gültepe Neighbourhood  Karacaşar Neighbourhood  Ali Galip Gençoğlu Neighbourhood  Erzurum Neighbourhood  Kale Neighbourhood | * Residents in the Project Area | Target group of the Project | Turkish | Written information, phone, face to face | Informed about the Project |
| Vulnerable/ Disadvantaged Individuals/ Groups | * Households with physically and/or mentally disabled family members * People with chronic disease * Elderly people over 70 years of age who live alone and in need of care * Female-headed households * Households where the head of the household is a child * Households with low or no income, and * Refugee households | Individuals with the potential to be more affected by project work | Demanded Language | Written information, phone, face to face | Be aware of project phases,  Translator,  Transportation |

## Stakeholder Engagement Program and Tools

A range of tools will be utilized for stakeholder engagement under this Project. Stakeholder engagement will continue to utilize these already established communication mechanisms, along with new mechanisms to be used as needed to ensure efficient and effective engagement throughout the lifetime of the Project. Project Owner will be the implementer and beneficiary of this Project. Implementation of key environmental and social requirements is the responsibility of the Project Implementation Unit (PIU). Consultants will be responsible for preparing the environmental and social impact and risk assessment study reports (i.e. ESMP and SEP), Supervisory Consultant having a range of specialties to inspect the contractor's activities on a daily basis. The construction works under the contract packages will be carried out by contractors. During the construction and operation phase, the officials from ILBANK and the WB will audit the Project Owner's performance regarding compliance with the provisions set out in the ESMP managed by the Project Owner.

The project has and will continue to use the following methods for interacting with stakeholders:

* Informal/formal face-to-face or online meetings with affected communities and other stakeholders –can be the main form of consultation throughout the lifetime of the Project. Stakeholders will be informed about these consultation meetings by telephone, brochures, posters, and e-mail. The meeting or any information sharing activity to be held with the stakeholders will be informed to the parties fourteen (14) days in advance.
* Focus group meetings with affected communities and other stakeholders – can be a form of engagement that will support negotiations throughout the life of the Project. It will also provide a suitable environment for stakeholders to express their views.
* Through the Project Owner's website, phone number and short message service (SMS) –It is a public website created for announcements, documents, reports, etc. – The final approved ESMP and SEP documents prepared for the Project will be published in English and Turkish via the Project website. Information on the application of the Grievance Mechanism created by the Project Owner will be also announced in the website. At the same time, all up-to-date information about the Project will be made available to the public via the website. The final approved ESMP and SEP will be published by ILBANK and on WB website. Besides, hard copies of the ESMP and SEP will be kept at the municipality hall for citizens who would like to read them.
* Written materials – Handbooks, banners, brochures, leaflets, posters, informative booklets, etc. to enable stakeholders to learn about the Project. – Materials will provide information about the Project and inform Stakeholders about all communication methods and stakeholder engagement tools created for the Project.
* Grievance Mechanism – will be open to access of both directly affected or interested stakeholders. A mechanism has been and will continue to be widely disclosed to the affected public.
* Media promotions: Throughout the life of the Project, information disclosure and contact information will be promoted through local and national newspapers and the social media accounts of the Project Owner.

A public consultation meeting will be held with the start of the construction phase of the Project and also an additional public consultation meeting will be planned;

* If there is a recurring grievance on a specific issue;
* If there is a major change regarding the project;
* If there is an intense impact foreseen by the Project Owner;
* If there is extra intensive work in the construction.

All kinds of notifications or complaints from stakeholders during informal/official face-to-face or Internet meetings will be recorded for processing in the mechanism and evaluated within the process of the Grievance Mechanism. The days and hours of the meetings will be arranged in consultation with the stakeholders, and the highest possible participation will be aimed. A shuttle will be arranged for stakeholders to come to the meetings when necessary, or the responsible people will be at the stakeholders’ location for face-to-face meetings.

Consultation and information disclosure strategy presented in Table 4‑3.

**Table 4‑3.** Consultation and Information Disclosure Strategy

| **Project Stage** | **Topic of Consultation** | **Method used** | **Timetable: Location and dates** | **Target stakeholders** | **Responsibilities** |
| --- | --- | --- | --- | --- | --- |
| Construction | Traffic safety | Public meeting, headman meeting | Two (2) days before possible traffic impact, whenever necessary during the construction | Communities,  Government/ Authorities | Consultation about traffic safety and measures adopted by the Project |
| Construction | Ensuring safety in emergencies | Public meeting, headman meeting | Whenever necessary during the construction | Communities,  Government/ Authorities | Introducing emergency authorized person, contact information |
| Operation | Repairs and maintenance of the system | If required, announcement on Municipalities’ website | Whenever necessary during the operation | Municipalities | Responsible for repairs and maintenance of the whole system |
| Operation | Sewerage system and wastewater discharge | If required, announcement on Municipalities’ website | Whenever necessary during the operation | Municipalities | Ensuring the sewerage system and compliance of wastewater discharge parameter with Regulations |
| Operation | Regulations about drinking water | If required, announcement on Municipalities’ website | Whenever necessary during the operation | Municipalities | Ensuring compliance of drinking water parameters comply with Regulations |
| **Project Stage** | **Topic of information to be disclosed** | **Method Proposed** | **Timetable: Location and dates** | **Target stakeholders** | **Responsibilities** |
| Construction | Traffic management plan | Brochures, public meeting, headman meeting | At public participating meeting,  When necessary | Communities | Providing information about traffic management |
| Construction | Emergency response plan | Brochures, public meeting, headman meeting | At public participating meeting,  When necessary | Communities | Providing information for emergencies |

## Previous Stakeholder Consultation

A face-to-face meeting was held on August 16, 2022 with 2U1K Environmental and Social unit officials and Project Owner officials. The purpose of the meeting is to present this business process with the ESMP and SEP documents to be prepared by 2U1K and to request the technical information needed by the authorities in this process.

The information of the experts / officials interviewed during the field visit is presented below.

* Hüseyin Özer – Civil Works Director
* Günal Özenirler – Environmental Engineer (2U1K)
* Leyla Demirçin – Environmental Engineer (2U1K)
* Şeyma Nur Geyik – Sociologist (2U1K)

In addition to this, primary data regarding the communities living around the project area and the potential project impacts were obtained through key informant interviews with the headmen of Hüyük, Gültepe, Karacaşar, Ali Galip Gençoğlu, Erzurum and Kale Neighbourhoods conducted via phone calls on October 26, 2022.

According to headmen, residents are experiencing water supply problems for their daily usage and irrigational purposes. Especially, to afford the water from private resources is challenging for residents. Hence, this Project is planned by Yerköy Municipality (Project Owner) to increase the benefit of the services.

During the meeting, headmen were informed about the construction works to be carried out within the scope of the project, the scope and duration of the project and preliminary information was provided. In accordance with stakeholder participation and consultations, the project owner was also advised to inform the headmen about the project.

The information obtained from the interview summarizes the current situation of the neighbourhood in general. The following topics were chosen to discuss the socio-economic indicators of the settlements around the project area:

* + Cultural Heritage;
  + Traffic and Transportation;
  + Demographics and Population;
  + Livelihoods and Employment;
  + Education;
  + Health;
  + Vulnerable/Disadvantaged Individuals/Groups;
  + Infrastructure and Services;
  + Land Acquisition;
  + Level of Information about the Project.

The information obtained in this context is given in Chapter 5 of the ESMP. Among these topics, the vulnerable/disadvantaged individuals/groups, which are the key elements within the framework of the stakeholder engagement plan of the project, are chosen and reflected in the chapter.

The headmen of the neighbourhoods stated that the Project will not have an adverse impact on the neighbourhoods and will benefit Yerköy District.

The information about vulnerable/disadvantaged individuals/groups was questioned during the interviews with provided by the headmen of neighbourhoods, and the groups identified are presented in Table 4‑4. No groups other than the vulnerable groups mentioned in Table 4‑4 are found.

**Table 4‑4.** Vulnerable/Disadvantaged Individuals/Groups in the Project Area

| **Settlement** | **Individuals over 65 years of age living alone** | **Poor families\*** | **Physically / Mentally disabled** |
| --- | --- | --- | --- |
| **Hüyük** | - | 10 | - |
| **Gültepe** | - | 1000 | - |
| **Karacaşar** | - | 90 | 8 |
| **Ali Galip Gençoğlu** | - | 50 | - |
| **Erzurum** | 6 | 30 | 3 |
| **Kale** | 55 | 100 | 1 |

*Source: Interviews with the headmen, 2022*

*\* Households, which are depended on social and economic support are defined as Poor Family by headmen.*

## Future Stakeholder Engagement

For all Category A and B subprojects proposed for the World Bank financing, the borrower consults project-affected groups and local non-governmental organizations about the project’s environmental and social aspects and takes their views into account, during the Environmental and Social Assessment process. The borrower initiates such consultations as early as possible.

For Category B subprojects, at least one consultation with affected groups and other relevant/affected stakeholders is anticipated after the draft ESMP report is completed. This consultation will include, but is not necessarily limited to, the following topics anticipated:

* Objective of the Project,
* Social, environmental, and ecological impacts/risks that are determined to occur upon the Project,
* Impacts and the mitigation or enhancement measures that are being implemented,
* Roles and responsibilities,
* Monitoring and management measures, and
* Information on the Grievance Mechanism for the Project.

On the other hand, the following content will be shared in this SEP for the stakeholder engagement activities:

* Location of consultation(s);
* Date(s) of consultation(s);
* Details on attendees (as appropriate);
* Meeting Program/Schedule: What is to be presented and by whom;
* Summary Meeting Minutes (Comments, Questions and Response by Presenters); and,
* Agreed actions.

The Project Owner will notify the headman's office located in the impact area two days in advance of any possible temporary road closures caused by construction works. Similarly, the project owner will inform the affected local people of the future works in the Municipal building and/or on the notice platforms two (2) days in advance.

Likewise, businesses, schools and/or hospitals that are potentially affected by construction activities will be notified of the works two days in advance, and activities will be driven by the feedback received from stakeholders so that businesses and/or services are not disrupted.

The Project Owner will be responsible for engagement with stakeholders as an on-going process throughout the life of the Project. Stakeholder logs will also be filled out for engagement activities (see Table 4‑5).

Table 4‑5. Sample Table for Stakeholder Engagement Log

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Project Phase** | **Date and Location** | **Method used** | **Purpose of Activity** | **Target Stakeholders** | **Meeting Summary/ Key Issues Raised** | **Follow-up Actions** | **Information Shared/ Documents Disclosed and Consulted** |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

All supporting documents for stakeholder activities (newspaper advertisements, list of attendees, full meeting minutes (as an annex), sample brochure) will be included in the SEP. It includes participant registration forms and full meeting minutes (information should be kept on record but not made publicly available in the appendix to the SEP – the relevant lines should be blurred when disclosing the SEP).

A summary of the implementation of the Grievance Mechanism will be published annually on the Yerköy Municipality website (https://www.yerkoy.bel.tr) after removing the identity information of the persons to protect their identity. Project’s environmental and social performance and implementation reports will share at least annually to stakeholders, but often will report more frequently during particularly active periods, when the public may experience more impacts or when phases are changing (for example, quarterly reports during construction, then annual reports during implementation).

Grievances can be an indication of raising stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders.

Internal and external stakeholders will be able to share their opinions and grievances via a range of options such as Project owner’s website, letters, and face to face meetings with the implementation of the SEP.

The Grievance Mechanism will be advertised and announced to affected stakeholders on Project Owner’s website so that they are aware of the process, know they have the right to submit a grievance, and understand how the mechanism will work and how their grievance will be addressed.

# GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is foremost to give access to a problem-solving procedure to Project affected people including affected communities and project workers. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Project workers, local communities, and other stakeholders.

The structured Grievance Mechanism will ensure that grievances associated with the Project are addressed through a transparent and impartial process. From the early stages of the Project lifecycle, the grievance procedure will be and will continue to be disclosed to the public through individual or group meetings, printed materials, notice boards.

Currently, the Project Owner handles public grievances and views through the call center system. This municipal unit is established to receive grievances and requests from local citizens and intended to produce possible solutions within the municipality for reported concerns. For this reason, it is anticipated that the existing Grievance Mechanism for this Project can be maintained as the primary Grievance Mechanism, because the Project is already within the municipal organization.

Although the call center system can be used to receive Project related grievances, a project-specific central system required to be established to compile the project related grievances and direct to responsible personnel and or unit for the resolution. Other grievances will receive by Contractor, CİMER, YİMER, İLBANK, WB etc. will be also directed to this central system. Yerköy Municipality will be the common beneficiary of Grievance Mechanism under this Project for contractors and workers / employees.

Stakeholders will be able to communicate their grievances and views via the channels presented below:

* Yerköy Municipality Website (<https://www.yerkoy.bel.tr>)
* E-mail ([info@yerkoy.bel.tr](mailto:info@yerkoy.bel.tr))
* Phone (0354) 516 24 45
* Contact Details of Yerköy Municipality Grievance Mechanism Officer
* Name-Surname: Erol AKBABA (Geological Engineer)
* Phone: 0 (546) 472 12 58
* Grievance and request boxes to be installed in the Ankara Metropolitan Municipal building and Yenimahalle Municipal building
* Grievance / notice boxes to be installed by contractor during the construction

During construction and operational activities, the Grievance Mechanism described above will continue to be driven by views of stakeholders, making this procedure accessible to all affected stakeholders. The Contractor will assign a responsible person to record the grievances received at the construction site verbally or through grievance forms that will be placed in the entrances of construction sites where local communities can easily reach. The responsible staff of Contractor will record all grievances that received at the construction site and convey to the Municipality’s grievance mechanism officer for further actions and resolution. The project's Grievance Mechanism officer and the contractor firm will be in close contact on this issue. Other grievances received by contractors, CİMER, YİMER, İLBANK, WB etc. will also be directed to this central system by the Project Owner.

The personnel to be appointed by the municipality will record the grievances and requests coming from different channels in a single established system and will provide solutions within the time and application framework determined below.

The personnel to be assigned by the municipality will record all grievances that are:

* Communicated to the Project officials personally,
* Communicated by phone/e-mail,
* Dropped in grievance boxes to be installed in the Municipal Building,
* Conveyed by stakeholders who want to communicate based on the Project documentation,
* From the personnel during the construction phase, and
* Communicated to contractors and inserted in a petition – in a single system and follow such grievances.

For this method to be successful, the Municipality personnel to be assigned will constantly be in contact with other municipality experts, contractors, and personnel who will be involved in the operational phase. Additionally, the job description of the Municipality personnel to be assigned will include the introduction of complaint mechanisms, which are publicly available and will be set up separately for employees, to relevant stakeholders.

Requests that require urgent remedy and/or support will be responded to and given support within the same day, and all outstanding grievances/requests will be recorded within two (2) business days and reviewed and assessed within ten (10) business days, and concluded not later than 15 business days. Subsequently, the necessary corrective actions will be taken to resolve the grievance. The suitable resolution for the complaint will be accordingly communicated to the complainant within the two (2) working days of completing the grievance investigation phase.

If stakeholders fail to reach a satisfactory solution through the channels provided above or have requests for a higher-level explanation, they will be able to reach ILBANK's communication channels, the Presidency’s Communication Centre (CIMER), the Foreigners Communication Centre (YIMER) and the relevant legal institutions.

ILBANK's Communication Channels:

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

Presidency’s Communication Centre (CIMER):

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

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

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

Applicants whose complaints could not been resolved through existing grievance mechanism or whose complaints contains sensitive issues can always apply to the relevant legal institutions. Relevant Institutions can be summarized as, but not limited to, as follows.

* Civil Courts of First Instance,
* Administrative Court,
* Commercial Courts of First Instance
* Labour Courts, and
* Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

Since there are special procedures/principles for handling sensitive content grievances (Sexual exploitation and abuse/sexual harassment (SEA/SH) and gender based violence (GBV) in the workplace or potential child abuse in project areas), these grievances will be handled centrally at ILBANK in line with ILBANK's sensitive grievances policies, not at the Project Owner or Contractor level.[[2]](#footnote-3) In case such a complaint about SEA/SH and GBV is received by the contractor or the project owner, they will be responsible for conveying the issue directly to the ILBANK GM focal point on SEA/SH and GBV issues. However, contractor and Project Owner should still be trained and informed about the principles applicable to SEA/SH and GBV cases. All details of the complainant of the sensitive case will be kept strictly confidential.

* ILBANK Website: <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
* ILBANK E-mail: uidbbilgi@ilbank.gov.tr
* ILBANK Address for Petition Service: ILBANK International Relations Department, Grievance Mechanism Team – Emniyet Mahallesi Hipodrom Caddesi 9/21 Yenimahalle/Ankara

The Municipality official who will manage the GM will be knowledgeable about the guidelines prepared by the WB to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in a culture of silence due to negative reactions from the community. For the avoidance of this, it is highly important that the stakeholders raise the grievances involving these issues about the Project anonymously. In addition, the authorities handling the grievances should address such issues within confidence and by an unbiased approach[[3]](#footnote-4).

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

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level Grievance Mechanisms or the Bank’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns.

Project affected communities and individuals may submit their complaint to the Bank’s independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the WB’s corporate Grievance Redress Service (GRS):

* http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service.

For information on how to submit complaints to the World Bank Inspection Panel:

* www.inspectionpanel.org.

To provide a framework for the Grievance Mechanism to be established, this subsection presents information about the data that should be included in the grievance registration procedure.

Contractors will deliver ESMRs to the Project Owner on a monthly basis. After reviewing these ESMRs, the Project Owner will submit the ESMRs on its environmental and social performances to ILBANK as quarterly, along with a summary of the grievances and how they are resolved, including the grievance register. Moreover, ESMRs will be submitted to WB by ILBANK every six (6) months together with progress reports. This SEP will be updated upon receipt of feedbacks from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be evaluated with feedbacks. In addition, SEP will be updated in case of major changes that may arise in the scope of the Project. Samples of consultation form, grievance form and grievance closure form prepared for use within the scope of the Project are given in Appendix-B, Appendix-C and Appendix-D, respectively.

## Grievance Register

To provide a framework for the GM to be established, this subsection presents information about the data that should be included in the grievance registration procedure.

As part of the Mechanism to be established, all received grievances will be recorded in the Grievance Register with a reference number assigned. All stakeholders who have filed a complaint may request that their applications be evaluated confidentially. The Project Owner will ensure that the name and contact details of the complainant are not disclosed without their consent.

In addition, the Grievance Register will be used to monitor the status of the grievance, determine the frequency of occurrence of the grievance, analyse the reasons for the grievance, and identify common grievances and recurring trends. Key Performance Indicators will be monitored using the database where the logs are kept.

The scope of the Grievance Register is presented in Appendix-E.

## Public Grievance Mechanism

Grievances should be reviewed as soon as possible to give priority to resolution. Regardless of general response and resolution times, some important grievances may require immediate action, such as an urgent safety issue or issues affecting public health.

There are 6 steps that supplement the Public Grievance Mechanism. This process is described by the steps provided in Table 5‑1.

Table 5‑1. Public Grievance Mechanism

| **Steps** | **Scope** | **Details** |
| --- | --- | --- |
| **Step 1** | **Identify grievances** | *Regardless of general response and resolution times, some important grievances may require immediate action, for example an urgent safety issue or issues regarding local people's livelihoods.* |
| **Step 2** | **Record grievances in the system** | *After determining the urgency level of the grievances, it will be ensured that the grievances are recorded.* |
| **Step 3** | **Determine specific actions for grievances and report them to relevant units / supervisors for resolution** | *Requests that require urgent support will be responded to and given support within the same day, and all outstanding grievances/requests will be approved within two (2) business days and responded to within ten (10) business days, and concluded not later than fifteen (15) business days. The suitable resolution for the complaint will be accordingly communicated to the complainant within the two (2) working days of completing the grievance investigation phase.* |
| **Step 4** | **Develop a response to grievances** | *A response will be developed by the delegated team within fifteen (15) days with input from relevant units and supervisors, excluding complaints involving emergencies. The response should identify a suitable resolution to the grievance, which could involve further information to clarify a situation, taking measures to mitigate problems.* |
| **Step 5** | **Communicate the response developed for grievances** | *The official appointed for the Project grievance handling will adopt and implement the most accurate approach to the communication of the relevant response. The response will also contain an explanation of how the person that raised the grievance can proceed with the grievance in case the outcome is not satisfactory.*  *In case the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the municipality's website and on notice boards located around the Project building as well as in the headman's offices in the settlements that are anticipated to be affected. In addition, the neighbourhood headmen should be contacted regarding anonymous grievances and resolutions.* |
| **Step 6** | **Close grievances** | *Based on the potential effects of the grievance, the complainant can be allowed time to respond, and the complainant's response will be recorded, to help assess whether the grievance is closed or whether further action is required.*  *Final approval will be provided after the relevant Project officials assess whether the grievance can be closed.*  *Closed grievance files will be recorded in a systematic way, and will be submitted to the authorities during third party inspections when necessary.* |

In case the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the Municipality's website and on notice boards located around the Project Administrative Building in construction area as well as in the headman's offices in the settlements that are anticipated to be affected.

## Worker Grievance Mechanism

Worker Grievance Mechanism is defined as grievances from Project employees (including subcontractors’ workers).This mechanism is structured to make it an effective approach for early identification, assessment, and resolution of grievances throughout the life of the Project. The Grievance Mechanism should guarantee that any employee raising a grievance will not be subject to any retaliation.

The scope of the Worker GM can be summarized as follows, but not limited to; occupational health and safety, labour conditions, wages, problems with the local community or co-workers, hygiene problems in common areas, insufficient food and/or worker safety, etc.

The GM will be informed to all Project workers through written and verbal communications. Each worker should be informed about the Grievance Mechanism at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example.

Confidentiality is highly important for some workers; therefore, workers can raise grievances anonymously. However, grievances lodged anonymously may prevent the expert, who is appointed by the Project Owner for grievances, from resolving the issue and giving feedback. Nevertheless, Project workers wishing to lodge grievances anonymously should be allowed to do so.

Requests that require urgent remedy and/or support will be responded to and given support within the same day, and all outstanding grievances/requests will be recorded within two (2) business days and reviewed and assessed within ten (10) business days, and concluded not later than fifteen (15) business days. Subsequently, the necessary corrective actions will be taken to resolve the grievance. The suitable resolution for the complaint will be accordingly communicated to the complainant within the two (2) working days of completing the grievance investigation phase.

In the case the complaint is assessed to be out of the scope of the Project’s Grievance Mechanism, the complainant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

The assigned Municipality official will open the grievance boxes within the scope of the Project every five (5) days and will make an assessment to determine whether the issues reported in writing fall within the scope of Worker Grievance Mechanism. The resolution process of anonymous grievances and other related notices may be announced in writing in common areas available to workers.

Grievances should be reviewed as soon as possible to give priority to resolution. Regardless of general response and resolution times, some important grievances may require immediate action, for example issues regarding workers' livelihoods.

There are five (5) steps that supplement the Public Grievance Mechanism. This process is described by the steps provided in Table 5‑2.

Table 5‑2. Worker Grievance Mechanism

| **Steps** | **Scope** | **Details** |
| --- | --- | --- |
| **Step 1** | **Identify grievances** | *The grievance will be raised through the Municipality/Contractor official to be assigned. This could be in person, by phone, letter, grievance boxes or email.* |
| **Step 2** | **Record grievances in the system** | *Once the grievance is received and recorded, the Municipality/Contractor official to be assigned based on the subject and issue will identify the department, management or personnel responsible for resolving the grievance.* |
| **Step 3** | **Follow up grievances** | *The Municipality/Contractor official to be assigned and the relevant units should assess the facts relating to the grievance. This should be aimed at establishing and analysing the cause of the grievance and identifying suitable mitigation measures. The analysis of the cause will involve assessing various aspects of the grievance, such as the background of the employee, frequency of the complaint occurrence, managerial practices, recent incidents in the workplace, etc.*  *When needed, the Municipality official to be assigned may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. A site visit may be deemed necessary to gain first-hand understanding of the nature of the complaint and to verify the validity and severity of the grievance.*  *After the details of the grievance are escalated to the relevant management unit, the said grievance will be discussed jointly by the employee and the regional and/or line manager.*  *The investigation phase should be completed not later than fifteen (15) business days of the grievance receipt.* |
| **Step 4** | **Resolve and close grievances** | *This is concluded based on the process developed in consultation between the assigned Municipality official and the related departments or management. The suitable remedy for the grievance should be communicated to the complainant within fifteen (15) business days of the completion of grievance investigation phase.*  *If the grievance is beyond the duty of the assigned Municipality official, the grievance should be escalated to the Project Implementation Unit to so that it can be resolved at managerial levels within seven (7) business days of the escalation.* |
| **Step 5** | **Close Grievances** | *The assigned Municipality official, having received the necessary signatures, will close the grievance once the grievance is resolved and the result is communicated to the complainant. The current status of the grievance and the details regarding how the grievance is resolved will be recorded in the Grievance Register. The purpose of recording further information in the grievance register is to provide a baseline for any similar grievances that may arise in the future.*  *If the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the Municipality's website and on notice boards located in common areas of the facility and should be announced through tool-box or weekly meetings.* |

# MONITORING AND REPORTING

The Project Owner will implement the monitoring activities throughout the lifetime of the Project. This SEP will be updated upon receipt of feedbacks from stakeholders. Communication tools included in the SEP but not accepted by the stakeholders will also be updated with feedbacks. In addition, SEP will be updated in case of major changes that may arise in the scope of the Project. Apart from these, a summary of the implementation of the Grievance Mechanism will be published annually on the Yerköy Municipality website (<https://www.yerkoy.bel.tr>) after removing the identity information of the persons to protect their identity.

Contractors will deliver ESMRs to the Project Owner on a monthly basis. After reviewing these ESMRs, the Project Owner will submit the ESMRs on its environmental and social performances to ILBANK as quarterly, along with a summary of the grievances and how they are resolved, together with the Grievance Register. The Grievance Mechanism established for the Project will be used effectively and the statistical summary of the outputs of the Grievance Mechanism will be reported to the Project Owner and lenders. Thus, the topics that the complaints are concentrated, the number of complaints, solutions and timing will be tracked through the database and the Grievance Register provided in Appendix-E.

Moreover, ESMRs will be submitted to WB by ILBANK every six (6) months together with Progress Reports. Project specific progress reports will also include a section on stakeholder engagement activities carried out during the specified period. Stakeholder engagement activities will be presented in a tabular format listing the tasks undertaken, as well as the time of action, the responsible party, the target group and the purpose of the action (see Table 4‑5).

The key performance indicators to be used during the implementation of this SEP are set out in Table 6‑1.

Table 6‑1. Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

| **No** | **KPI** | **Goal** | **Project Phase** | **Monitoring Measures** | **Assessment Frequency** | **Responsible Party** |
| --- | --- | --- | --- | --- | --- | --- |
| 1 | Number and type of grievances, including the following details:  Gender, province, category of grievance, status of grievances (closed, pending, resolved), etc.  Number of invalid grievances | Decrease in number of grievances received  Increase in grievance closeout rate (closed grievances /total number of grievances)  Decrease in time of grievance closeout,  Zero grievances not closed out within the target timeframe | Construction and Operation | Database | Two (2) months | Project Owner |
| 2 | Number of grievances responded in the target timeframe of one month | 90% target | Construction and Operation | Database | Two (2) months | Project Owner |
| 3 | Providing feedback to stakeholders on the implementation of the Grievance Mechanism (the number and type of consultations, number of participants, type of stakeholders engaged etc.) | Regular reporting to stakeholders on the results of the Grievance Mechanism | Construction and Operation | Reporting | Two (2) months | Project Owner |
| 4 | Internal audit of the Grievance Mechanism to ensure that the Grievance Mechanism is implemented and that grievances are adequately handled | Annual audit of closing the targeted 90% of the grievances within one month to the satisfaction of the complainant | Construction and Operation | Inspection Report | Two (2) months | Project Owner |
| 5 | Number of Planned Stakeholder Engagement Activities  Type of planned Stakeholder Engagement Activities  Number of participant stakeholders  Type of participant stakeholders  (Activity records, meeting minutes, participant records and related reports, documents, etc.) | Increase in the number of activities carried out  Increase in the number of participants  Increase in the number of different types of stakeholder (as group or person) | Construction and Operation | Reporting | Three (3) months | Project Owner |

The current Grievance Mechanism officials and the official to be appointed by the municipality will review a statistical and qualitative analysis of feedback and complaints and their results every two (2) months and will submit the complaint feedback reports to the Project Implementation Unit and the Project Owner.

Two (2) months reports will contain only as much information as required regarding the grievance, and the personal data of individuals using the Grievance Mechanism will remain confidential and will not be shared in these reports.

The SEP report is a living document and needs to be updated throughout the life of the project. These updates can be updated in line with a change in the project, increasing complaints, requests/demands and opinions arising in the stakeholder engagement plans to be held quarterly. The Project Owner will inform ILBANK of any changes made in the SEP. At the same time, the complaints that arise in the complaint feedback reports that the complaint mechanism officer will submit to the project owner every two (2) months are included in the stakeholder engagement plan. It will be an important indicator for the need for updating.

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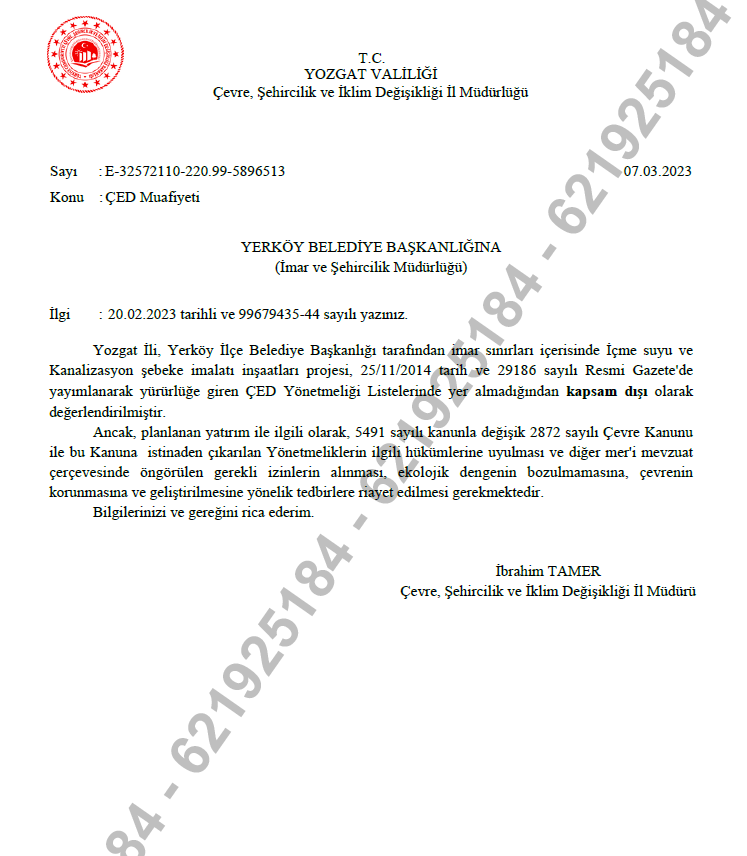
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**APPENDIX – A Exclusion Letter**



**APPENDIX – B Sample Consultation Form**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **YERKÖY MUNICIPALITY**  **logo içeren bir resim  Açıklama otomatik olarak oluşturuldu** | | **YERKÖY MUNICIPALITY**  CONSTRUCTION OF YERKÖY (YOZGAT) ADDITIONAL WATER SUPPLY AND SEWERAGE SYSTEM COMPONENTS PROJECT  **PROJECT NO: 22/010** | | | | |
| **CONSULTATION FORM** | | | | |
| Form Completed by: | | | | | Date and Time: | |
| Subject of Meeting: | | | | | YERKÖY  MUNICIPALITY  Project No: 22/010 | |
| 1. **MEETING DETAILS** | | | | | | |
| Interviewed Entity: | | | | | Mode of Communication | |
| Name-Last Name of the Interviewee: | | | | | Telephone / Toll Free Number | |
| Telephone: | | | | | Face-to-Face Meeting | |
| Address: | | | | | Website / E-mail | |
| E-mail: | | | | | Other (Describe) | |
| **Type of Stakeholder** | | | | | | |
| Governmental  Body | PAP | | Private  Enterprise | Professional Chamber | | NGO |
| Focus Groups | Union of  Industries | | Labour Union | Media | | University |
| 1. **MEETING DETAILS** | | | | | | |
| Project-related questions: | |  | | | | |
| Project-related concerns/feedback: | |  | | | | |
| Responses to the views provided above: | |  | | | | |

**APPENDIX – C Sample Grievance Form**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **YERKÖY MUNICIPALITY** | | **YERKÖY MUNICIPALITY**  CONSTRUCTION OF YERKÖY (YOZGAT) ADDITIONAL WATER SUPPLY AND SEWERAGE SYSTEM COMPONENTS PROJECT  **PROJECT NO: 22/010** | | | | |
| **GRIEVANCE FORM** | | | | |
| Form Completed by: | | | | | Date and Time: | |
| Subject of Meeting: | | | | | YERKÖY MUNICIPALITY  PROJECT NO: 22/010 | |
| 1. **PARTICULARS OF THE COMPLAINANT** | | | | | | |
| Name-Last Name: | | | | | **Grievance Communicated by:** | |
| TR ID No: | | | | | Telephone / Toll Free Number | |
| Telephone: | | | | | Face-to-Face Meeting | |
| Address: | | | | | Website / E-mail | |
| E-mail: | | | | | Other (Describe) | |
| **Type of Stakeholder** | | | | | | |
| Governmental  Body | PAP | | Private  Enterprise | Professional Chamber | | NGO |
| Focus Groups | Union of  Industries | | Labour Union | Media | | University |
| 1. **DETAILED INFORMATION ON THE GRIEVANCE** | | | | | | |
| Description of the grievance: | |  | | | | |
| Solution method requested by the complainant | |  | | | | |
| *Recorded by*  *Name-Last Name/Signature* | | *Complainant*  *Name-Last Name/Signature* | | | | |

**APPENDIX – D Sample Grievance Closure Form**

|  |  |  |
| --- | --- | --- |
| **YERKÖY MUNICIPALITY** | | **YERKÖY MUNICIPALITY**  CONSTRUCTION OF YERKÖY (YOZGAT) ADDITIONAL WATER SUPPLY AND SEWERAGE SYSTEM COMPONENTS PROJECT  **PROJECT NO: 22/010** |
| **GRIEVANCE CLOSURE FORM** |
| **YERKÖY MUNICIPALITY**  **PROJECT NO: 22/010** | | |
| 1. **DETERMINATION OF THE CORRECTIVE ACTION** | | |
| **1** |  | |
| **2** |  | |
| **3** |  | |
| **4** |  | |
| **5** |  | |
| **Responsible Departments** |  | |
| 1. **GRIEVANCE CLOSURE** | | |
| *This section will be completed and signed by the complainant, if the grievance provided in the Grievance Register Form is remediated.* |  | |
| *Grievance Closure Date:* | *Grievance Closer's Full Name/Signature:*    *Complainant's Full Name/Signature:* | |

**APPENDIX – E Grievance Register**

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

1. ILBANK and the World Bank (WB) designed the Sustainable Cities Project (SCP) to create a support mechanism for the participating second-tier metropolitan municipalities to plan and invest in a sustainable future. In support of this objective, the Sustainable Cities Project will establish a support system to allow the municipalities of the developing cities to identify and finance and make preparations for financially sound investments and to enhance their urban planning capacities. Investments through the project will comply with both the Turkish environmental regulations and the World Bank's Safeguarding Policies. [↑](#footnote-ref-2)
2. https://ewsdata.rightsindevelopment.org/files/documents/12/WB-P170612\_7nHpF6X.pdf [↑](#footnote-ref-3)
3. https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf [↑](#footnote-ref-4)