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SUSTAINABLE CITIES PROJECT-II

Additional Financing

ODUNPAZARI REHABILITATION CENTER FOR AUTISTIC AND DISABLED PEOPLE PROJECT

STAKEHOLDER ENGAGEMENT PLAN (SEP)





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ODUNPAZARI REHABILITATION CENTER FOR AUTISTIC AND DISABLED PEOPLE PROJECT

STAKEHOLDER ENGAGEMENT PLAN

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LIST OF ABBREVIATIONS

AF	Additional Finance
AoI	Area of Influence
ASD	Autism Spectrum Disorder
CİMER	Presidency's Communication Centre
EBRD	European Bank for Reconstruction and Development
EHS	Environmental Health and Safety
EU	European Union
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Reports
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
HRS	Human Resources Specialist
IB	ILBANK
IFC	International Finance Corporation
KPI	Key Performance Indicators
KUDEB	Conservation, Implementation, and Inspection Offices
OHS	Occupational Health and Safety
OP	Operational Policy
PIU	Project Implementation Unit
PPM	Public Participation Meeting
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 Center





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EXECUTIVE SUMMARY

ILBANK A.Ş. (ILBANK) receives technical and financial support from the World Bank (WB) and the European Union (EU) to improve planning capacity and access to targeted municipal services in participating municipalities and public services. Odunpazarı Municipality Rehabilitation Centre Project for People with Autism and Disability is financed within the scope of Sustainable Cities Project-II Additional Financing (SCP-II AF).

Municipalities have duties and responsibilities such as the integration of vulnerable and disadvantaged citizens into society and providing access to urban services for everyone. Persons with disabilities who do not have or have limited ability to live independently in society need special support. It is important to provide counselling to the parents and relatives of these individuals. In this context, this project has been developed through SCP-II AF for disabled individuals to receive day care and boarding services in Odunpazarı District, the most populous district of Eskişehir Province.

The Project is designed to provide residential rehabilitation and day care home services for people with disabilities living in the city. The service capacity of the Project has been determined as 40 people. The Project is designed for the rehabilitation process of disabled individuals and their families including workshops, health support services, personal self-care and psycho-social support services, as well as inpatient and day care. With the start of the project, priority will be given to individuals with a Special Needs Report, and services will be provided to disabled individuals aged 12 and over living in Eskişehir Province. It is anticipated that the project will serve the public for 50 years.

With the project going into operation, families will have the opportunity to leave disabled people for a day and/or boarding, and the boarding period is planned to be a maximum of one week. In addition to accommodation services, it is planned to provide free workshop services with the planned Project. Also, there is no informal or formal users on the land.

The project area will be built on 1,898.63 m² of land in Çankaya Neighbourhood, Şahin Tepesi Locality Parcel No. 24806, Block No. 1, which belongs to Odunpazarı Municipality. The project area has been the property of the municipality for over 20 years; therefore, no land acquisition is required as part of the Project.

The activities under this Project are not included in Annex-1 and Annex-2 according to the Turkish Environmental Impact Assessment (EIA) legislation, and therefore the Project is considered as out of scope and the Exclusion Letter granted by the Provincial Directorate of Environment, Urbanization and Climate Change is provided in Appendix-A.

Within the scope of SCP II-AF, Operational Policies (OP) 4.01, 4.04, 4.11, 4.12 are taken into consideration. The critical and natural habitats are examined within the scope of the World Bank Operational Policy (OP) 4.04 on natural habitats and there is no critical and natural



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habitat within the immediate surroundings of the project area. The potential impacts and mitigation measures for these are prepared 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, restriction on land use or access to lands or natural resources.

As per WB OP 4.01, 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 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.

Within the scope of the project, there is no associated facility, road, etc. The centre will be built on approximately 1,898.63 m² of ground; therefore, no major impact is expected apart from the general impacts of the construction works. Since the construction works for the Project will be carried out in a neighbourhood close to the city centre, it is foreseen that no camp site will be established for the employees. Since the project is a simple construction project, no accommodation facility will be built, but 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 meet standards for worker accommodation prepared by International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) and approved by the WB¹.

¹<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/604561468170043490/workers-accommodation-processes-and-standards-a-guidance-note-by-ifc-and-the-ebd>



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1 INTRODUCTION

This plan presents the Stakeholder Engagement Plan (SEP) for 'Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project' (hereinafter referred to as 'Project'), and is prepared by 2U1K Mühendislik ve Danışmanlık A.Ş. (2U1K) for "Odunpazarı Municipality" (hereinafter referred to as 'Project Owner').

The Project will be established to serve the individuals with disabilities and autism in Eskişehir Province and will be built at Odunpazarı District, Çankaya Neighbourhood, Şahin Tepesi Locality. The Project is designed to provide in-patient rehabilitation centre and day care house services to the disabled residing in Eskişehir Province. The designed Project encompasses the rehabilitation of the disabled and their families and in-patient and day care as well as workshops, health support services, personal self-care and psycho-social support services.

A loan application was lodged to ILBANK² to put the project into practice. The World Bank (WB), acting as the Project financier, authorized ILBANK as the Borrower and the Project coordinator. In this respect, an Environmental and Social Management Plan (ESMP) was 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 ESMP. The Project will be implemented under SCP-II AF, in accordance with the Environmental Regulations of the Republic of Türkiye and the Safeguard Policies of the World Bank (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.

²ILBANK 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.



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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 World Bank Safeguard Policies, including Operational Policies, Environmental and Social Management Framework of SCP-II AF and Turkish legislation. SEP is a living document and it will be regularly monitored, reviewed and updated by the Project Owner.





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2 ABOUT PROJECT

The Project Owner is Odunpazarı Municipality who provides services to 85 neighbourhoods (Eskisehir Odunpazarı Municipality, 2021). The Project is designed to provide in-patient rehabilitation centre and day care house services to the disabled residing in the city. The Project service capacity is set as 40 people. The designed Project encompasses the rehabilitation of the disabled and their families and in-patient and day care as well as workshops, health support services, personal self-care and psycho-social support services. With the operation of the Project, priority will be given to the individuals with a Special Needs Report, and the disabled residing in Eskisehir Province, who is aged twelve (12) years old and above, will be provided with services.

The Rehabilitation Centre for the People with Autism and the Disabled People will be constructed on the “Karapınar Neighbourhood Ali İhsan Karabulut Street Lot 2863 Parcel 1 which is a parcel approximately 1,898.63 m², which belongs to the Odunpazarı Municipality. The criteria considered in the selection of this area are that there is no need for expropriation, there is less urban development around it. In addition, the land is located in Slum Prevention Zone No. 3, which is in the Zoning Plan Public Service Area.

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, and it is anticipated that 10 workers will be working at the same time and totally 25-30 workers will work at different stages of the construction. The corresponding details will be updated together with the determination of the construction plan of the Project Owner.

With the Project becoming operational, families will have the means to leave the disabled for a day and/or on an in-patient basis, and the in-patient care period is planned to be a maximum of one week. Along with accommodation services, it is planned to offer workshop services free of charge. Since the Project is not intended to derive profit, the services, such as accommodation, healthcare and heating, will be charged at the minimum rate to be set by the Project Owner.

The Project is designed in accordance with the Statutory Regulation on Special Care Centres for the Disabled, with 40% of the land being for residential purposes. The Project building is designed to feature 4 stories in accordance with the legal story restriction. The entrance of the building is designed in line with the access of the disabled, which will not require stairs and/or ramps.

It is expected to implement the tender in the period between February 2022 and April 2025 including the construction phase. It is anticipated that the project will serve the public for 50 years.



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The building to be constructed for the Project is designed to comply with environmental practices (stormwater tanks, solar panels designed for the roof), and these practices will be maintained during construction and operation phases.

Within the scope of the Project, trainers and healthcare personnel to be recruited to support the disabled and their families will be selected among the municipality employees. The personnel who will work at the centre will be trained on environmental and social issues. 2U1K will organize, together with the Project Owner, a workshop for this training in accordance with the scope of work agreement. The content of the workshop is provided in the ESMP document.

The Project will provide temporary employment opportunities during the construction phase. The personnel planned to be recruited to provide services in the operation phase of the Project are presented in Table 2-1.

Table 2-1. Personnel to be Employed as Part of the Project

Personnel		
	Profession	Number of Employees
Healthcare Personnel	Physicians	1
	Nurses	1
	Medical Technicians	1
	Physiotherapy Technicians	1
	Physiotherapists	1
	Care Personnel	1
	Emergency Medical Technicians	1
	Health Officers	1
Trainers	Social Workers	1
	Psychologists	1
	Child Development Experts	1
	Special Education Providers	1

During the operation of the center, sufficient security personnel will be assigned to the centre by the Odunpazarı Municipality Support Services Directorate. The procurement of cleaning services will be realized. The number of employees in these areas has not been determined at this stage. The acceptance of the disabled people to benefit from services of the Center, care durations with documents that will be requested from their guardians and the operation procedures are still not determined by the Municipality.

Lastly, the Project Owner is a member of the Alliance for Healthy Cities³ which was established within the scope of the Healthy Cities Movement launched in 1988 by the World Health

³ <https://odunpazari.bel.tr/kurumsal/saglikli-kentler-birligi>



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Organization (WHO) to identify the health indicators of cities and to find solutions to the factors that adversely affect these indicators (Odunpazarı Municipality, 2021).

The activities under this Project are not included in Annex-1 and Annex-2 according to the Turkish EIA legislation, and therefore the Project is considered as out of scope. The exclusion letter granted by the Provincial Directorate Environment, Urbanization and Climate Change is presented in Appendix-A.

Within the scope of SCP-II AF, Operational Policies (OP) 4.01, 4.04, 4.11, 4.12 are taken into consideration. The critical and natural habitats are examined within the scope of the World Bank's Operational Policy (OP) 4.04 on Natural Habitats and there is no critical and natural habitat within the immediate surroundings of the project area. The potential impacts and mitigation measures for these are prepared by carrying out literature and surface studies as a requirement of the World Bank's Operational Policy OP 4.11 on Physical Cultural Resources.

OP 4.12 Involuntary Resettlement does not apply to this project as there is no restriction on land acquisition or access to lands or natural resources.

As per WB O.P. 4.01, 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 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.

2.1 Purpose and Requirements of the Project

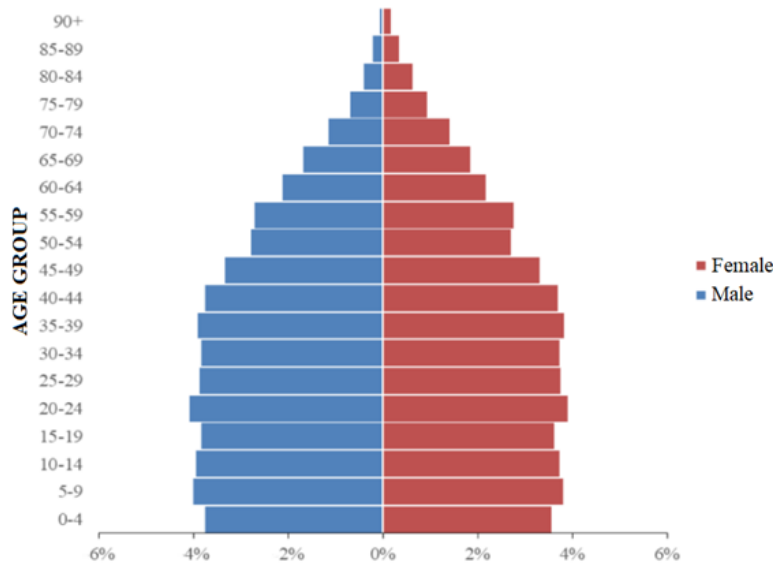
The Project will be established to serve the individuals with disabilities and autism. According to the World Health Organization, the definition of the disabled refers to any person with any loss or abnormality of psychological, physiological, or anatomical structure or function; restriction or lack (resulting from an impairment) of ability to perform an activity in the manner or within the range considered normal for a human being; and disadvantage for a given individual, resulting from an impairment or disability, that limits or prevents the fulfilment of a role that is normal (depending on age, gender and social and cultural factors) for that individual (World Foundation for the Disabled, 2014).

To define the Autism Spectrum Disorder (ASD), also known as autism, the term "autistic person" is used in the Regulation on Special Educational Services (2006). The autistic person is defined as any person whose limitations in social interaction, verbal and non-verbal communication, interests and activities occur in early childhood and who need special education and support education services due to these traits (Ministry of Family and Social Policies, 2016).



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Türkiye has a population of 83,614,362 as of December 31, 2020, (TurkStat, 2020). 7%⁴ of the population in Türkiye consists of the disabled (General Directorate of Disabled and Elderly Services, 2021). Considering the ratio of the disabled by age groups, their distribution is presented in Figure 2-1.



Source: (General Directorate of Disabled and Elderly Services, 2021)

Figure 2-1. Population Pyramid, 2020

The Barrier Free Living Centers system has been operational since 2006 to eliminate the obstacles to the involvement of the disabled in social life and to provide sufficient resources and expertise to realize the potential of the disabled.

In Türkiye, it is especially required to enhance the scope and accessibility of affordable rehabilitation / accommodation / educational services. social exclusion, which arises from the inability of individuals with disabilities and of their families, especially those having a poor level of income, to access the necessary services, has caused a rise in Barrier Free Living services and similar activities throughout the country.

Hence, this Project planned to be executed by the Project Owner is expected to give specific priority to the disabled and their families who have no access to necessary services and to induce a very positive impact on their quality of life.

⁴ Based on the results of the Population and Housing Research, the ratio of the population with at least one condition of disability (aged 3 years old and above) is 6.9% (4,876,000 individuals). Considering the distribution by gender, this ratio is 5.9% among males and 7.9% among females.



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On July 26, 2021, 2U1K environmental and social experts conducted a site visit to see the project site and to gather detailed information about the project. According to the information during the site visit provided by Deputy Mayor of Odunpazarı Municipality, Eskişehir Province is highly preferred by disabled individuals and their families since there are many practices for disabled people and there are many NGOs that play an active role in the city. The objective of the Project is to gradually improve the environmental, financial / economic, and social sustainability of the Project Owner and to meet the needs of disabled and their families, who are increasing with the population. The implementation of the project is important for the individuals with special needs to adapt themselves to an independent life and to participate in social life.

2.2 Project Location

The Project will be located at Şahin Tepesi Locality in Çankaya Neighbourhood, Odunpazarı District of Eskişehir province. The project area has been the property of the municipality for over 20 years; therefore, no land acquisition will be required 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 Project's AoI has been determined as 200 m based on the expert opinion of the Consultant, and in this context, Çankaya and Erenköy neighbourhoods are identified as the settlements within Area of Influence (AoI) during construction, while the Project will serve the entire city during the operation phase. The Project location and its Area of Influence (AoI) is presented in Figure 2-2.



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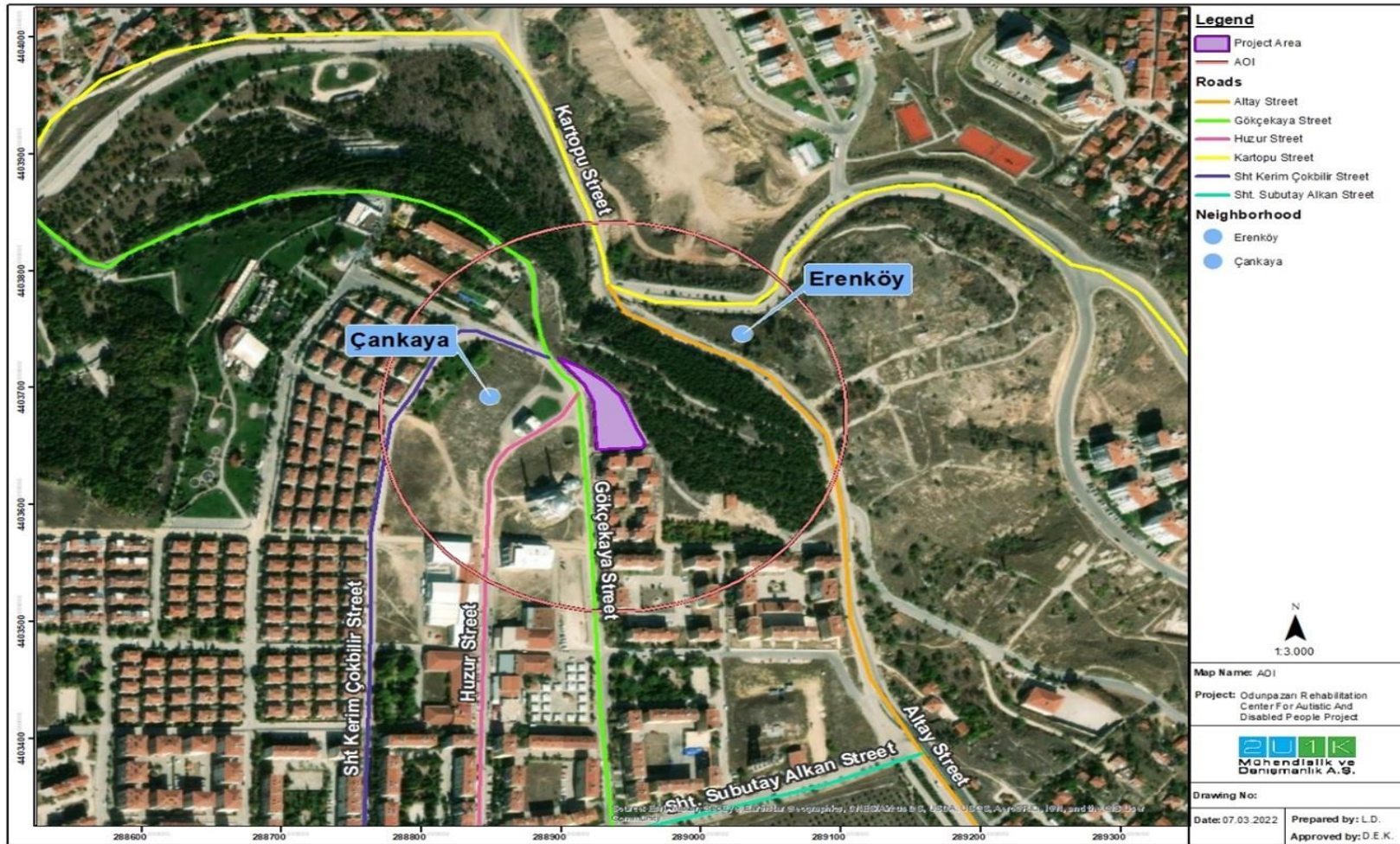


Figure 2-2. Project Location and Area of Influence



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2.3 Roles and Responsibilities

The Project is executed by the Deputy Mayor (financial operations), Deputy Mayor (technical operations), Survey and Project Director, Architect, Civil Works Director, and Women and Family Services Director under the coordination of Mayor of Odunpazarı. The organizational chart of the Project is presented in Figure 2-3.

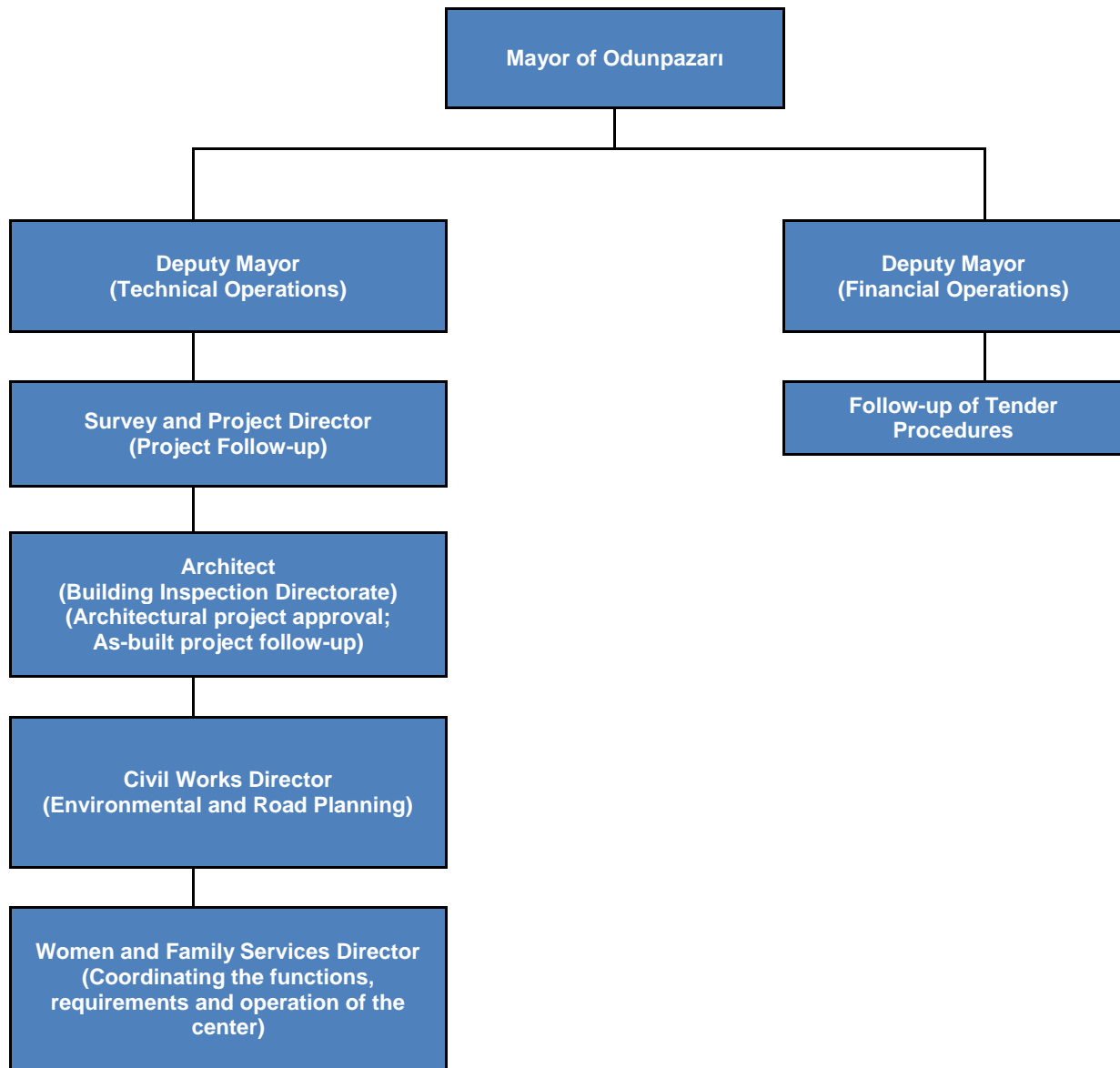


Figure 2-3. Organizational Chart of Rehabilitation Centre for Autistic and Disabled People



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The Project Owner, in collaboration with relevant third parties, will establish, maintain and promote, as required, a Project-specific organizational structure that defines roles, responsibilities and authority for the implementation of ESMP and SEP as provided as a model in Figure 2-4. Specific personnel with clear boundaries of responsibility and authority should be appointed, including 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 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 Management Unit. Additionally, personnel should have adequate knowledge, skills and experience to competently and efficiently take specific measures and actions required under ESMP.

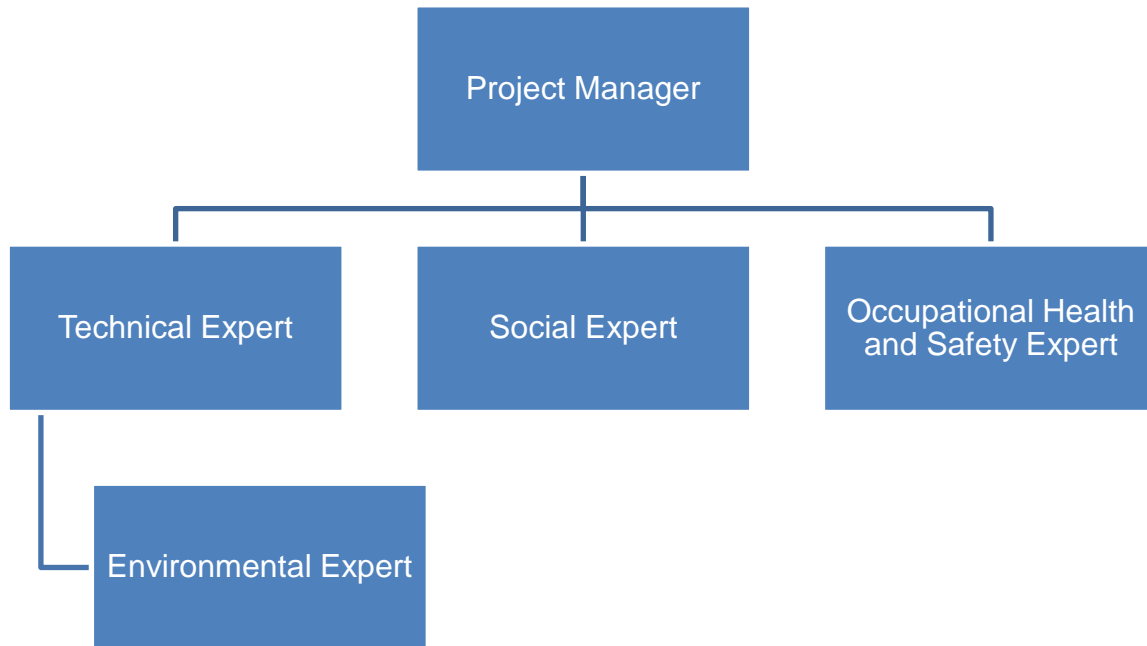


Figure 2-4. Organizational Chart of Project Management Unit



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2.4 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. 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	<ul style="list-style-type: none"> - 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	<ul style="list-style-type: none"> - 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	<p>The Project Owner will appoint a Supervisory Consultant having a range of specialties to inspect the contractor's activities on a daily basis. Apart from the guidance to be given to the Project Owner about WB OPs and also the public participation and announcement requirements and the project documents in compliance with WB requirements, the Supervisory Consultant will appoint the personnel given below:</p> <ul style="list-style-type: none"> - 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



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Responsible Party	Terms of Reference
	<p>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).</p> <ul style="list-style-type: none">- 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, for example the National General Certificate of Occupational Health and Safety or equivalent. 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 Project disclosure package, as well as the implementation of SEP, and for reporting to the Project Owner regularly. Manages the Grievance Redress Mechanism (GRM) 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). The expert is responsible for regularly reporting to the Project Owner.
Contractor	<ul style="list-style-type: none">- 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.- 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.- 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 and the WB



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Responsible Party	Terms of Reference
	within three (3) business days. 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 thirty (30) days.
World Bank and ILBANK	<ul style="list-style-type: none">- 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.- In this respect, contractors will submit monthly Environmental and Social Monitoring Reports (ESMRs) to the Project Owner, and the Project owner will present biannual ESMRs to ILBANK.- 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 with environmental and social monitoring reports every three (3) months. 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.- 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



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3 REGULATORY REQUIREMENTS

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

3.1 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 Mays 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 public participation meeting (PPM) 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 PPM 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 investing public, to get their opinions and suggestions regarding the project; Public Participation Meeting will be accomplished on the date given by Ministry and Ministry qualification given institution / organization and project owners as well as the participants of the project affected community will be expected to attend in a central location determined by the Governor.
a)	The competency issued institutions / organizations by the Ministry will publish the meeting date, time and place through widely published newspaper at least ten (10) calendar days before the determined date for the PPM.
b)	Public Participation meeting will be held under the Director of Provincial Directorate of Environment, Urbanization and Climate Change or authorized chairman. The meeting will inform the public regarding the project, receive views, questions and suggestions. The Director may seek written opinions from the participants. Minutes of meeting will be sent to Ministry, with one copy kept for the Governorship records.
2)	Governorship will announce the schedule and contact information regarding for the public opinion and suggestions. Comments received from the public will be submitted to Commission as per the schedule.
3)	Members of Commission may review the Project implementation area before the scoping process, also may attend to public participation meeting on the date announced.
4)	The competency issued institutions / organizations by the Ministry could provide studies as brochures, surveys and seminars or through internet in order to inform the public before the Public Participation Meeting.

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



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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-1 and Annex-2 according to Turkish EIA legislation, therefore they are 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.

3.2 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 Operational Policies (OPs) and compilation. The following OPs are included within the framework of this ESMP;

Environmental Assessment Policy (OP 4.01)

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 World Bank's Operational Policy of Environmental Assessment (O.P. 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,





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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

An Environmental and Social Management Plan should be prepared by the Project Owner for the investments defined and outlined within the scope of this Project and based on the World Bank's Operational Policies (OP).

When preparing the Environmental and Social Management Plan, the operational policies listed above were determined considering the scope of the project as well as the geographical, natural and demographic structure of the region. Upon the assessment, the project category was regarded as Category B.

Natural Habitats (OP 4.04);

- 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.

Physical Cultural Resources (OP 4.11)

- 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.



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- 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.

Involuntary Resettlement (OP 4.12);

- 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 the Involuntary Resettlement Policy 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:

United Nations Convention on Rights of Persons with Disabilities

- The Convention follows decades of work by the United Nations to change attitudes and approaches to persons with disabilities. It takes to a new height the movement from viewing persons with disabilities as “objects” of charity, medical treatment and social protection towards viewing persons with disabilities as “subjects” with rights, who are capable of claiming those rights and making decisions for their lives based on their free and informed consent as well as being active members of society.
- The Convention is intended as a human rights instrument with an explicit, social development dimension. It adopts a broad categorization of persons with disabilities and reaffirms that all persons with all types of disabilities must enjoy all human rights and fundamental freedoms. It clarifies and qualifies how all categories of rights apply to persons with disabilities and identifies areas where adaptations have to be made for persons with disabilities to effectively exercise their rights and areas where their rights have been violated, and where protection of rights must be reinforced.





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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.

3.3 Major Gaps between the Turkish EIA Regulation and World Bank's Environmental Assessment Policy (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 World Bank Policies, the more stringent one will apply to the implementation of the project.





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Table 3-2. Major Gaps between Turkish EIA Regulation and WB OP's

Steps	EIA Regulation	World Bank OP 4.01
Screening	<p>The EIA Regulation classifies the proposed projects into two categories:</p> <ol style="list-style-type: none"> 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. 	<p>Within the scope of WB OP 4.01, the proposed projects are classified into three categories:</p> <ol style="list-style-type: none"> 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. <p>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.</p>
Public Participation Meeting	<p>For the projects included in the list of Annex-1, which therefore require the preparation of an EIA report, the public participation meeting, whose place and date is decided by the Provincial Directorate, is held not later than 10 days prior to the meeting by disclosing it publicly in local and national newspapers.</p> <p>No public participation meeting is held for the projects included in the list of Annex-2.</p>	<p>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.</p>
Disclosure	<p>The EIA Report for the projects in the list of Annex-1 will be made available to the public opinion at the headquarters of MoEUCC or provincial directorates. Following MoEUCC's final assessment of the EIA report, the Governor's Office will disclose its reasoned decision publicly.</p> <p>For the projects in the list of Annex-2, the final Project Introduction File (PIF) will be disclosed publicly at the Provincial Directorates.</p>	<p>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).</p> <p>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</p>



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Steps	EIA Regulation	World Bank OP 4.01
		<p>Summary. The Bank will distribute the executive summary to its executive directors, and discloses it publicly on an external website.</p> <p>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.</p>

Source: ILBANK "Sustainable Cities Project - II Additional Financing Environmental and Social Management Framework", April 2019





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4 PREVIOUS STAKEHOLDER CONSULTATION

A site visit was made on 26.07.2021 and the neighbourhood headmen could not be reached during the site visit. The 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 Çankaya and Erenköy Neighbourhoods conducted by phone calls on September 27, 2021.

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.

Neighborhood headmen stated that the Project will not have a negative impact on the neighborhoods and will benefit the entire Eskişehir during the operation period.

According to the information provided by the headmen of Çankaya and Erenköy neighbourhoods, information about vulnerable/disadvantaged individuals/groups was questioned and the groups identified are presented in Table 4-1.

Table 4-1. Vulnerable/Disadvantaged Individuals/Groups in the Project Area

Settlement	Individuals over 65 years of age living alone	Poor families*	Physically / Mentally disabled	Widowed Female Household Head	Child Household Heads
Çankaya Neighbourhood	Yes	No	Yes / 10 people	Yes / 3 people	No
Erenköy Neighbourhood	Yes	Yes	Yes / 25 people	Yes / 200 people	No

Source: Survey study with the headmen, 2021

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



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5 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 5-1 presents the interested and affected stakeholders,





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Table 5-2 presents stakeholders needs within the scope of the Project.

Table 5-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	Impact/Interest Reason	Impact/ Interest Level
Internal Stakeholders			
• Rehabilitation Centre Personnel	Project-affected party	Employees who will ensure the realization of the Project during operation	High
• Contractor's Employees	Project-affected party	Employees who will ensure the realization of the Project during construction	High
• Beneficiaries	Project-affected party	Stakeholders who will receive service throughout the operation of the Project	High
Government / Authorities			
• Eskisehir City Health Authority • Eskisehir Provincial Directorate of Family Labour and Social Services • Eskisehir Provincial Directorate of Environment, Urbanization and Climate Change • Eskisehir Metropolitan Municipality Coordination Centre for the Disabled	Project-interested party	Local government authorities responsible for health, environment, social services and disabled people in Eskişehir province	Medium
Private Education Institutions			
• Bulutay Special Education and Rehabilitation Centre • Akonder Special Education and Rehabilitation Centre • Ekin Basak Special Education and Rehabilitation Centre	Project-affected party	Private institutions related to the education of people with disabilities	High
Associations / Non-Governmental Organizations			
• Bugday Tanesi Association for Reintegrating People with	Project-affected party	NGO's for people with disabilities	High



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Stakeholder Groups	Stakeholder Type	Impact/Interest Reason	Impact/ Interest Level
Intellectual Disabilities into the Community • Eskisehir Art and Sport Club Association for Physically Handicapped People • Anadolu University Educational Centre for Children with Impaired Hearing (ICEM) • Türkiye Disabled Association Eskisehir Branch Office			
Municipality			
• Odunpazarı Municipality	Project-affected party	Project Owner, Project Development, Implementation and Employment	High
Neighbourhood			
• Cankaya Neighbourhood • Erenkoy Neighbourhood • All neighbourhoods to be served by this Rehabilitation Centre	Project-affected party	Commissioning, Potential noise and dust emission during the construction phase	High
Vulnerable/Disadvantaged 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 • Women • Female-headed households • Households where the head	Project-affected party	Commissioning, Potential noise and dust emission during the construction phase, project design to consider the special needs of vulnerable groups	High



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Stakeholder Groups	Stakeholder Type	Impact/Interest Reason	Impact/ Interest Level
<p>of the household is a child</p> <ul style="list-style-type: none">Households with low or no income, andRefugee households			



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Table 5-2. 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)
Private Education Institutions	<ul style="list-style-type: none"> Bulutay Special Education and Rehabilitation Centre Akonder Special Education and Rehabilitation Centre Ekin Basak Special Education and Rehabilitation Centre 	Private institutions related to the education of people with disabilities	Turkish	Written information, phone, e-mail, face to face	Be aware of project phases
Associations / Non-Governmental Organizations	<ul style="list-style-type: none"> Bugday Tanesi Association for Reintegrating People with Intellectual Disabilities into the Community Eskisehir Art and Sport Club Association for Physically Handicapped People Anadolu University Educational Centre for Children with Impaired Hearing (ICEM) Türkiye Disabled Association Eskisehir Branch Office 	Associations and NGO's for disabled	Turkish	Written information, phone, e-mail, face to face	Be aware of project phases,
Municipality	<ul style="list-style-type: none"> Odunpazarı Municipality 	Management unit	Turkish	Written information, phone, e-mail, face to face	Be aware of project phases
All neighbourhoods to be served by this Rehabilitation Centre	<ul style="list-style-type: none"> Families with disabled child 	Target group of the Project	Turkish	Written information, phone, face to face	Disabled child care, Transportation
Cankaya and Erenkoy Neighbourhoods	<ul style="list-style-type: none"> Families with disabled child 	Target group of the Project Approximately 40 children	Turkish	Written information, phone, face to face	Disabled child care, Transportation
Vulnerable/ Disadvantaged Groups	<ul style="list-style-type: none"> 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 Women Female-headed households Households where the head of the household is a child 	Individuals with the potential to be more affected by project work	Demande Language	Written information, phone, face to face	Be aware of project phases, Translator, Transportation



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Community	Stakeholder group	Key characteristics	Language needs	Preferred notification means (e-mail, phone, radio, letter)	Specific needs (accessibility, large print, child care, daytime meetings)
	<ul style="list-style-type: none">Households with low or no income, andRefugee households				



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6 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. 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 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 redress 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.
- 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 redress 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.





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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 6-1.

Table 6-1. 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
Construction	Learning the expectations/needs of the disabled and reflecting them on the project design	Focus Group Meetings	Whenever necessary during the construction	Disabled People	Consultation to be held periodically
Construction	To learn the expectations and demands of the disabled from NGOs and to consider them in project design	Face to Face Meeting	Before project construction period	Associations / Non-Governmental Organizations	Consultations to take place before construction begins
Operation	Listening to the needs and problems identified by the NGO's, developing joint solution strategies, taking action to improve and consulting to ensure that the project can be more effective	Face to Face Meeting	Regularly throughout the operating period.	Associations / Non-Governmental Organizations	Consultations to take place through project operation phase



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Project Stage	Topic of Consultation	Method used	Timetable: Location and dates	Target stakeholders	Responsibilities
Operation	Learning the expectations/needs/ grievances of the disabled and taking appropriate actions throughout the operation.	Focus Group Meetings	Whenever necessary during the operation	Disabled People	Consultation will be held periodically.
Operation	Ensuring safety in emergencies	Public meeting, headman meeting	Whenever necessary during the operation	Communities	Introducing emergency authorized person, contact information
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
Operation	Emergency response plan	Brochures, public meeting, headman meeting	At public participating meeting, When necessary	Communities	Providing information for emergencies

6.1 Future Stakeholder Engagement

6.1.1 Public Participation Meeting

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,





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- 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 redress 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 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 6-2).

Table 6-2. 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

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.



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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 redress mechanism will be published annually on the Odunpazarı Municipality website (<https://www.odunpazari.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 growing 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 web-site, letters, and face to face meetings with the implementation of the SEP.

The grievance redress mechanism will be advertised and announced to affected stakeholders on Project Owner's web-site 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.





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7 INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT DURING THE COVID-19 PANDEMIC CONDITIONS

The unprecedented nature of the COVID-19 Pandemic process implies that all elements of Project activities, including stakeholder engagement, may be affected. Given the compulsory restrictions and social distancing measures associated with Covid-19, alternative approaches to stakeholder engagement emerged in the short term.

In efforts to disseminate information, the Project Owner will try to communicate reliable and accurate information to all stakeholders by ensuring that the information is in a form and language that are easily understandable and culturally appropriate.

It is recommended to use the following tools to interact with stakeholders during the pandemic period, provided that they are not limited to:

- Brochures,
- E-mail,
- Notice boards intended for the public,
- Phone interviews and messaging,
- Project Owner's website.

Additionally, changes in the operations of the Project Owner, which are caused by COVID-19 and which may have an impact on the public, will be reported accordingly. These include, but are not limited to:

- Changes in the project resulting from by COVID-19,
- Changes in the presentation of social development programs,
- Changes in employment, procurement from local businesses, etc.,
- Changes in timeframes to solve public grievances, and
- New or modified public awareness communication campaigns on COVID-19, which are coordinated with relevant authorities and based on the information from recognized sources such as the World Health Organization.

Lastly, the Project will consider the new approaches shown below to provide effective engagement during Covid-19. Consultation and information disclosure strategies may change due to Covid-19 conditions according to (Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19, 2020). These may include, but are not limited to:





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- Changes to project activities – construction and/or operations as a result of COVID-19;
- Changes to delivery of community development programs;
- Changes to implementation schedules of resettlement and livelihood restoration programs;
- Changes to employment, sourcing from local business, and so forth;
- Changes to project security arrangements, such as an increased public security presence in project areas;
- Changes to timelines for resolving open grievance cases; and
- New or modified health awareness communication campaigns related to COVID-19 that are coordinated with relevant authorities and based on information from recognized sources, such as the World Health Organization (WHO).

Alternative Information Disclosure and Stakeholder Engagement Measures during Covid-19 Restrictions presented in Table 7-1.



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Table 7-1. Alternative Information Disclosure and Stakeholder Engagement Measures during Covid-19 Restrictions

Stakeholder Groups	Topics	Frequency	Methods and Materials	Lead and Supporting Responsibility
Government / Authorities <ul style="list-style-type: none"> Eskisehir City Health Authority Eskisehir Provincial Directorate of Family Labour and Social Services Eskisehir Provincial Directorate of Environment, Urbanization and Climate Change Eskisehir Metropolitan Municipality Coordination Centre for the Disabled 	<ul style="list-style-type: none"> Updates on project activities and progress Local procurement and employment data Updates on social distancing restrictions and Covid-19 related measures 	When necessary	Teleconference Virtual meetings Written up-to-date information Project Owner's website Grievance redress mechanism	Project Owner/Project Implementation Unit (PIU)
Municipality <ul style="list-style-type: none"> Odunpazari Municipality 	<ul style="list-style-type: none"> Required updates on project activities and progress Updates on social distancing restrictions and Covid-19 related measures 	When necessary	Teleconference Virtual meetings Written up-to-date information Project Owner's website Grievance redress mechanism	Project Owner/PIU
Internal Stakeholders <ul style="list-style-type: none"> Odunpazari Municipality Municipality Personnel Contractor Personnel 	<ul style="list-style-type: none"> Updates on the project progress and planning Changes in project operational procedures and emergency response plans Changes in occupational safety and labour conditions and (if any) guidance on access to subsidies Measures to be taken in case of Covid-19 symptoms Locations of centres specific to Covid-19 cases Updates on new labour regulations regarding Covid-19 measures 	When necessary	E-mail / SMS to be sent to all personnel Virtual meetings Teleconference Project Owner's websites Written up-to-date information Grievance redress mechanism	Project Owner Contractor/PIU



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Stakeholder Groups	Topics	Frequency	Methods and Materials	Lead and Supporting Responsibility
Associations / Non-Governmental Organizations <ul style="list-style-type: none"> Bugday Tanesi Association for Reintegrating People with Intellectual Disabilities into the Community Eskisehir Art and Sport Club Association for Physically Handicapped People Anadolu University Educational Centre for Children with Impaired Hearing (ICEM) Türkiye Disabled Association Eskisehir Branch Office Special Education Institutions <ul style="list-style-type: none"> Bulutay Special Education and Rehabilitation Centre Akonder Special Education and Rehabilitation Centre Ekin Basak Special Education and Rehabilitation Centre 	<ul style="list-style-type: none"> Updates on project activities and progress Updates on social distancing restrictions and Covid-19 related measures 	When necessary	Virtual meetings Written up-to-date information Grievance redress mechanism	Project Owner/PIU
Neighbourhood <ul style="list-style-type: none"> Cankaya Neighbourhood Erenkoy Neighbourhood All neighbourhoods to be served by this Rehabilitation Centre 	<ul style="list-style-type: none"> Required updates on project activities and progress Updates on social distancing restrictions and Covid-19 related measures 	When necessary	Project Owner's websites Written up-to-date information Grievance redress mechanism	Project Owner/PIU/ Contractor



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8 GRIEVANCE REDRESS MECHANISM

The purpose of the Grievance Redress Mechanism 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 Redress 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 Public Desk and Barrier Free Contact Desk 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. While the Public Desk and Barrier Free Contact Desk system is not regarded as a Grievance Redress Mechanism, it is recognized as a general grievance system adopted by municipalities within their own organizations.

For this reason, it is anticipated that the existing grievance redress mechanism system for this Project can be maintained as the primary grievance redress mechanism, because the Project is already within the municipal organization.

Although the Public Desk and Barrier Free Contact Desk 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 received by Contractor, CİMER, YİMER, İLBANK, WB etc. will be also directed to this central system. Odunpazari Municipality will be the common beneficiary of grievance redress mechanism under this Project for contractors and workers / employees.

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

- Odunpazari Municipality Grievance Redress Mechanism Officer Contact Details
 - Name/Surname: Cansu Uzun
 - E-mail: opetut@gmail.com
 - Telephone: +90 222-213 30 30 with the extension number 2251
- To Odunpazari Municipality Public Desk centre and/or by e-mail or telephone (halkmasasi@odunpazari.bel.tr , 444 26 00)



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- By visiting the Barrier Free Contact Desk Centre at Odunpazari Municipality in person and/or by telephone at 0213 30 30
- Grievance and request boxes to be installed in the Municipal building
- Grievances/request boxes to be placed by contractors during construction phase

During construction and operational activities, the grievance redress 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 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 and the Project Building,
- Conveyed by stakeholders who want to communicate based on the Project documentation,
- From the personnel during the construction phase,
- From the operating personnel, 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



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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.

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

Presidency's Communication Centre (CIMER):

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

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



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- 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

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 and gender based violence in the workplace or potential child abuse in project areas), these grievances will be handled centrally at ILBANK, not at the Project Owner or Contractor level.⁵ In case such a complaint about SEA/SH is received by the contractor or the project owner, they will be responsible for conveying the issue directly to the ILBANK GRM focal point on SEA/SH issues. However, contractor and Project Owner should still be trained and informed about the principles applicable to SEA/SH cases.

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

The Municipality official who will manage the Grievance Redress Mechanism will be knowledgeable about the guidelines prepared by the World Bank to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in 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

⁵ https://ewdata.rightsindevelopment.org/files/documents/12/WB-P170612_7nHpF6X.pdf



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anonymously. In addition, the authorities handling the grievances should address such issues with in confidence and by an unbiased approach⁶.

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.

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 logs. Moreover, ESMRs will be submitted to WB by ILBANK every 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.

8.1 Grievance Log

To provide a framework for the Grievance Redress Mechanism 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 Log with a reference number assigned.

In addition, the Grievance Log 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 Log is presented in Appendix-E.

8.2 Public Grievance Redress 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 Redress Mechanism. This process is described by the steps provided in Table 8-1.

⁶ <https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorks2.pdf>



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Table 8-1. Public Grievance Redress 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 is 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	<p>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.</p> <p>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.</p>
Step 6	Close grievances	<p>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.</p> <p>Final approval will be provided after the relevant Project officials assess whether the grievance can be closed.</p> <p>Closed grievance files will be recorded in a systematic way, and will be submitted to the authorities during third party inspections when necessary.</p>



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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.

8.3 Worker Grievance Redress Mechanism

Worker Grievance Redress 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 Redress Mechanism should guarantee that any employee raising a grievance will not be subject to any retaliation.

The scope of the Worker Grievance Redress Mechanism 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 Grievance Redress Mechanism will be informed to all Project workers through written and verbal communications. Each worker should be informed about the grievance redress 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 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 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 Redress Mechanism, the complainant should be notified through the desired communication method and an alternative mode of solutions should be suggested.





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The assigned Municipality official will open the grievance boxes within the scope of the Project every 5 days and will make an assessment to determine whether the issues reported in writing fall within the scope of Worker Grievance Redress 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 5 steps that supplement the Public Grievance Redress Mechanism. This process is described by the steps provided in Table 8-2.

Table 8-2. Worker Grievance Redress Mechanism

Steps	Scope	Details
Step 1	Identify grievances	<i>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.</i>
Step 2	Record grievances in the system	<i>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.</i>
Step 3	Follow up grievances	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>The investigation phase should be completed not later than 15 business days of the grievance receipt.</i></p>
Step 4	Resolve and close grievances	<p><i>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 15 business days of the completion of grievance investigation phase.</i></p> <p><i>If the grievance is beyond the duty of the assigned Municipality official, the grievance should be escalated to the Project Management Unit to so that it can be resolved at managerial levels within 7 business days of the escalation.</i></p>
Step 5	Close Grievances	<p><i>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 Log. The purpose of recording further information in the grievance log is to provide a baseline for any similar grievances that may arise in the future.</i></p> <p><i><u>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 toolbox or weekly meetings.</u></i></p>



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9 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 redress mechanism will be published annually on the Odunpazarı Municipality website (<https://www.odunpazari.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, including the grievance logs, together with the Grievance Register. The grievance redress mechanism established for the Project will be used effectively and the statistical summary of the outputs of the grievance redress 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-5.

Moreover, ESMRs will be submitted to WB by ILBANK every six (6) months together with Progress Reports. The Project Owner will be responsible for ensuring that the Contractor and its subcontractors comply with applicable national/international regulations and lenders' requirements.

The key performance indicators to be used during the implementation of this SEP are set out in Table 9-1

Table 9-1. 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	2 months	Project Owner



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No	KPI	Goal	Project Phase	Monitoring Measures	Assessment Frequency	Responsible Party
2	Number of grievances responded in the target timeframe of one month	90% target	Construction and Operation	Database	2 months	Project Owner
3	Providing feedback to stakeholders on the implementation of the Grievance Redress 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 Redress Mechanism	Construction and Operation	Reporting	2 months	Project Owner
4	Internal audit of the Grievance Redress Mechanism to ensure that the Grievance Redress 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	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	3 months	Project Owner

The current grievance redress 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 months, and will submit the reports to the Project Management Unit and the Project Owner.

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

According to the reporting requirements set in the Project's ESMF, the project owner will be responsible for submitting a quarterly report to ILBANK on the progress of the project. 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



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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 6-2). The project owner will inform ILBANK of any changes made in the SEP (if any).

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. 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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APPENDIX - A Exclusion Letter



T. C.
ESKİŞEHİR VALİLİĞİ
Çevre, Şehircilik ve İklim Değişikliği İl Müdürlüğü

Sayı : E-43549071-220.03-2602757

Konu : ÇED Görüşü

ODUNPAZARI BELEDİYE BAŞKANLIĞINA

İlgi : 03.01.2022 tarihli ve 153788 referans no.lu başvuru.

İlimiz, Odunpazarı İlçesi, Çankaya Mahallesi, 24806 ada, 1 parselde tarafınızca yapılması planlanan "Engelsiz Yaşam ve Otizm Merkezi" projesi, 25.11.2014 tarih ve 29186 sayılı Resmi Gazete'de yayımlanarak yürürlüğe giren ÇED Yönetmeliği listelerinde yer almadığından kapsam dışı olarak değerlendirilmiştir.

Ancak, faaliyetiniz kapsamında, 2872 sayılı Çevre Kanunu ile bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diğer meri mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliştirilmesine yönelik tedbirlere riayet edilmesi, kurum faaliyetlerinin tamamlanmasına müteakip Çevre İzin ve Lisans Yönetmeliği hükümleri uyarınca Müdürlüğümüz görüşü alınması hususunda;

Bilgilerinizi ve gereğini rica ederim.

Hikmet ÇELİK
Çevre, Şehircilik ve İklim Değişikliği İl Müdürü

Bu belge, güvenli elektronik imza ile imzalanmıştır.

Doğrulama Kodu: F8D7E57F-DB37-403A-88B7-A46E8F9C12B6

Doğrulama Adresi: <https://www.turkiye.gov.tr>

Ana Bina: Ertuğrulgazi Mah. Aliya İzzetbegović Cad. No:2 Tepebaşı/ESKİŞEHİR

Bilgi için: Fatih OKSUZ

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APPENDIX – B Sample Consultation Form

ODUNPAZARI MUNICIPALITY  ODUNPAZARI BELEDİYESİ	ODUNPAZARI MUNICIPALITY <i>Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project</i> PROJECT NO: 21/016			
CONSULTATION FORM				
Form Completed by:	Date and Time:			
Subject of Meeting:	ODUNPAZARI MUNICIPALITY Project No: 21/016			
1. MEETING DETAILS				
Interviewed Entity:	Mode of Communication			
Name-Last Name of the Interviewee:	Telephone / Toll Free Num <input type="checkbox"/>			
Telephone:	Face-to-Face Meeting <input type="checkbox"/>			
Address:	Website / E-mail <input type="checkbox"/>			
E-mail:	Other (Describe) <input type="checkbox"/>			
Type of Stakeholder				
Governmental Body <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Profession Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Focus Groups <input type="checkbox"/>	Union of Industries <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. MEETING DETAILS				
Project-related questions:				
Project-related concerns/feedback:				
Responses to the views provided above:				

Recorded by
Name/Last Name:
Signature:

Complainant
Name/Last Name:
Signature



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APPENDIX – C Sample Grievance Form

ODUNPAZARI MUNICIPALITY  ODUNPAZARI BELEDİYESİ		ODUNPAZARI MUNICIPALITY <i>Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project</i> PROJECT NO: 21/016 GRIEVANCE FORM		
Form Completed by:		Date and Time:		
Subject of Meeting:		ODUNPAZARI MUNICIPALITY PROJECT NO: 21/016		
1. PARTICULARS OF THE COMPLAINANT				
Name-Last Name:		Grievance Communicated by:		
TR ID No:		Telephone / Toll Free Num <input type="checkbox"/>		
Telephone:		Face-to-Face Meeting <input type="checkbox"/>		
Address:		Website / E-mail <input type="checkbox"/>		
E-mail:		Other (Describe) <input type="checkbox"/>		
Type of Stakeholder				
Governmental Body <input type="checkbox"/>	PEB <input type="checkbox"/>	Private Enterprise <input type="checkbox"/>	Professional Chamber <input type="checkbox"/>	NGO <input type="checkbox"/>
Focus Groups <input type="checkbox"/>	Union of Industries <input type="checkbox"/>	Labor Union <input type="checkbox"/>	Media <input type="checkbox"/>	University <input type="checkbox"/>
2. 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



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APPENDIX – D Sample Grievance Closure Form

ODUNPAZARI MUNICIPALITY  ODUNPAZARI BELEDİYESİ	ODUNPAZARI MUNICIPALITY <i>Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project</i> PROJECT NO: 21/016
GRIEVANCE CLOSURE FORM	
ODUNPAZARI MUNICIPALITY PROJECT NO: 21/016	
1. DETERMINATION OF THE CORRECTIVE ACTION	
1	
2	
3	
4	
5	
Responsible Departments	
2. GRIEVANCE CLOSURE	
<i>This section will be completed and signed by the complainant, if the grievance provided in the Grievance Log Form is remediated.</i>	

Grievance Closure Date:

Grievance Closer's Full Name/Signature:
Complainant's Full Name/Signature:



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APPENDIX - E Sample 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	

Source: ILBANK Grievance Register Table