

TURKIYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT

37. 695 MWp/25 MWe Solar (Photovoltaic) Power Plant Project Of Şanlıurfa Water And Sewerage Administration (ŞUSKI)

Stakeholder Engagement Plan

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ABBREVIATIONS

ALAP	Abbreviated Land Acquisition Plan
AoL	Area of Influence
CIMER	Presidency's Communication Centre
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Report
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
ETL	Energy Transmission Line
E&S	Environmental and Social
FI	Financial Intermediary
GBV	Gender-Based Violence
GM	Grievance Mechanism
GMCP	Grievance Mechanism Contact Person
IFC	International Finance Corporation
IFI	International Financial Institutions
ILBANK	İller Bankası A.Ş.
LMP	Labor Management Plan
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NGO	Non-Governmental Organization
OIP	Other Interested Parties
OHS	Occupational Health and Safety
PAP	Project Affected People
PIU	Project Implementation Unit
PMU	Project Management Unit
Project	PUMREP
PUMREP	The Turkish Public and Municipal Renewable Energy Project
PIU	Project Implementation Unit
RE	Renewable Energy
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
Sub-Project	SUSKI 37,695 MWp/25 MWe Solar Power Plant
SUSKI	Şanlıurfa Water and Sewerage Administration
TEIAS	Turkish Electricity Transmission Corporation
WB	World Bank
WBG	World Bank Group
YIMER	Foreigners Communication Center

EXECUTIVE SUMMARY

The Türkiye Public and Municipal Renewable Energy Project (PUMREP) aims to support the Government of Türkiye to scale-up renewable energy use in the public sector by focusing on central government buildings and municipalities. The Project will contribute to expanding the distributed Renewable Energy (RE) market in public facilities and help demonstrate leadership in the public sector to use sustainable energy solutions to deliver on the country's climate mitigation commitment and enhance energy security.

The PUMREP will support introducing RE technologies in municipalities and will be implemented by İller Bankası Inc. (ILBANK). The RE installations will be primarily used to offset the overall energy consumption from public facilities (e.g., administrative buildings, water supply and water treatment, public lighting, etc.) and thus reduce the municipalities' energy bills.

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

The ESMS is aimed at ensuring systematic identification, assessment, management, monitoring, and reporting of the environmental and social (E&S) risks and impacts of the projects and subprojects financed by the International Finance Institutions (IFIs). This process will be implemented on an ongoing basis throughout their loan duration in line with the requirements of the national legislation, international agreements and conventions ratified by Türkiye and E&S standards of lending IFIs (World Bank for the PUMREP). As a critical element of the ESMS, ILBANK has adopted and disclosed¹ an E&S Policy applicable to all ILBANK projects and subprojects financed through IFIs.

The sub-project is categorized as of Moderate Risk as per the Risk Screening conducted under ILBANK ESMS and World Bank ESF. One of the tasks under the scope of the sub-project is the preparation of a Stakeholder Engagement Plan (SEP) in accordance with ILBANK's ESMS and WB ESF including applicable Environmental and Social Standards (ESSs), World Bank Group (WBG) General Environment Health and Safety (EHS) Guidelines and Industry Sector Guidelines, and the national legislation in force in Türkiye.

The "37,695 MWp/ 25 MWe Solar Power Plant Project" (the sub-project) is planned to be implemented by Şanlıurfa Water and Sewerage Administration (SUSKI) in Şanlıurfa Province Karaköprü District Aşık Neighborhood the borders of lots 1174, 1175, 1177, 1181 of block 0. Lots 1174, 1175, 1177 and 1181 of block 0 determined as the sub-project areas are 1,205,685.26 m² activities will be carried out 343, 953 m² parcels. The parcels have been allocated to ŞUSKİ from Şanlıurfa Metropolitan Municipality.

It is planned to construct a total of 6 SPPs in 4 parcels:

- lot 1174 of block 0 SSP-6 SPP-7,
- lot 1175 of block 0 SPP-8,
- lot 77 of block 0 SPP-5,

¹ <https://www.ilbank.gov.tr/sayfa/ilbank-environmental-and-social-policy>

- lot 1181 of block 0 SPP-1 and SPP-2.

SEP has been developed to ensure that project-affected parties, other interested groups, and vulnerable or disadvantaged stakeholders receive relevant, timely, and accessible information. The SEP establishes a structured approach to stakeholder engagement, enabling ŞUSKI to identify all stakeholders, understand how they are affected by the sub-project, and ensure its implementation is inclusive and community-oriented. By fostering and maintaining constructive and ongoing relationships, particularly with project-affected parties, SEP supports participatory and socially responsible sub-project execution. This ensures that stakeholder perspectives are incorporated into the sub-project's design and its environmental and social performance.

SEP is therefore prepared to identify all stakeholders, inform them about the sub-project and its potential environmental and social risks and impacts, and their interest in the sub-project and to establish an effective communication with stakeholders and to define procedures and principles to improve participation. This Plan aims to create long-term relations between the sub-project and local communities based on mutual trust and transparency. In addition, it is aimed to reduce the negative effects that may arise from the sub-project and increase the positive effects.

This plan includes the legal framework, process of identifying stakeholders, explaining the stakeholder engagement program (comprising purpose and timing, proposed strategy for information disclosure, proposed strategy for consultation, future engagement activities. In addition, specific engagement and disclosure activities targeting vulnerable/disadvantaged groups/individuals identified under the SEP have been defined.

In order to obtain information about the current socio-economic structure of the neighborhood in the subproject area, as well as to determine the level of information about the subproject, opinions and concerns about the sub-project, a sub-project site visit was organized by CA Engineering on 3-4.10.2024. Finally, a Grievance Monitoring Table is presented at the end of this SEP and the tools of monitoring activities to be carried out to evaluate the performance and effectiveness of the sub-project are suggested.

1 INTRODUCTION/SUB-PROJECT DESCRIPTION

The Public and Municipal Renewable Energy Project (PUMREP) (hereinafter the “Project”) aims to support the Government of Türkiye to scale-up Renewable Energy (RE) use in the public sector by focusing on central government buildings and municipalities.

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

The sub-project was initially developed as six subprojects on 4 separate parcels to be by SUSKI. This Stakeholder Engagement Plan (SEP) of SUSKI is an action plan which was prepared for the Şanlıurfa 25 MW Solar Power Plant Project (SPP) of SUSKI and sets out methods for effective communication and interaction with stakeholders. Therefore, this plan is prepared in line with PUMREP’s Stakeholder Engagement Plan² which is a disclosed framework document on ILBANK’s web site in order to define the stakeholder engagement process including the grievance mechanism.

SEP will guide SUSKI to implement structured stakeholder consultation and participation in all phases of sub-project implementation in accordance with applicable national and international regulations and WB requirements on stakeholder participation, particularly the Environmental and Social Standard (ESS) 10 of the World Bank’s Environmental and Social Framework (ESF) “Stakeholder Engagement and Information Disclosure”.

This SEP is an action plan which was prepared for SUSKI 37,695 MWp/ 25 MWe Solar Power Plant sub-project and sets out methods for effective communication and interaction with stakeholders.

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

SEP provides a roadmap for the SUSKIs’s engagement with stakeholders and contributes to the achievement of the sub-project objectives and operation of the sub-project in a transparent, inclusive, responsive and cooperative manner. Stakeholder engagement activities will also contribute to environmental and social assessments, by identifying the stakeholders’ concerns about the sub-project, thus facilitating the effective solution of these impacts and concerns.

1.1 Components of the Subproject

The subproject which is ŞUSKI 37,695 MWh/25 MWe Solar Power Plant Project is comprised of a six SPPs, a sub-station and an energy transmission line. The subproject is located in lots 1174, 1175, 1177 and 1181 of block 0 Aşık neighborhood in the Karaköprü district of Şanlıurfa Province.

The total sub-project areas are around 40 ha. The solar power plant projects will meet the energy of more than 26.260 households with 25 MW of electrical energy production.

² <https://www.ilbank.gov.tr/uidb/turkiye-public-and-municipal-renewable-energy-project/accordion/201>

Details of the sub-project are given in **Hata! Başvuru kaynağı bulunamadı..**

Table 1 Sub-project Details

Solar Power Plant (SPP)	Power to be generated	Block/Lot	Lot Area (m ²)	SPP Area (m ²)	Type	Ownership
SPP-1	4 MW	0/1181	150,789	58,150	Stony land	The ownership of the lands belongs to Şanlıurfa Metropolitan Municipality and has been allocated to SUSKI.
SPP-2	5 MW			79,950		
SPP-5	5 MW	0/1177	97,088	79,950		
SPP-6	4 MW	0/1174	127,052	63,965		
SPP-7	3 MW			47,973		
SPP-8	4 MW	0/1175	192,349	63,965		

Within the scope of the sub-project, 1000 meters of new ETL line will be constructed. It will be connected to the ETL to which the existing SPP facility is connected. As indicated in Figure 1 **Hata! Başvuru kaynağı bulunamadı..**, the line to be constructed between the SPPs on parcels 1177 and 1175 will pass through lot 1176 of block. This parcel 1176 is owned by Şanlıurfa Metropolitan Municipality and official letter was received for parcel number 1176, which belongs to Şanlıurfa Metropolitan Municipality. The ETL status is given **Hata! Başvuru kaynağı bulunamadı..**, and the new ETL to be constructed within the scope of the subproject and existing ETL routes are shown in Figure 1. A total of 25 pylons are planned for the new ETL. The pylon stands correspond to cadastral gaps. Pylon stands do not coincide with privately owned areas.

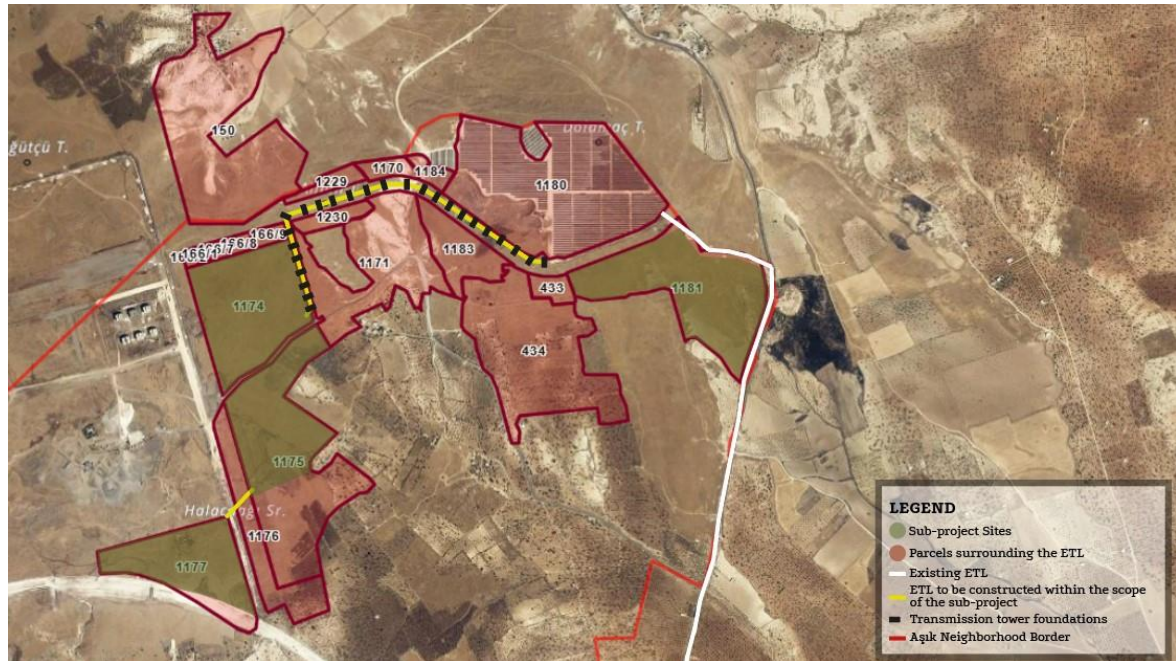


Figure 1 The Sub-project ETL Route

Table 2 Technical Information on the ETL

Information	Remarks/ Notes
Status of ETL	Overhead line will be constructed
Transformer station (for national grid connection)	3 piece (1,250 kV)
Length of the route (km)	1
Voltage level (kV)	33 kV
Number of ETL towers (pylons)	25 towers
Total footprint area per each ETL tower (m²)	ETL will be comprised of footprint of 25 towers
Number of parcels subject to expropriation	Since the lots 1174, 1175, 1176, 1177 and 1181 of block 0 belong to Şanlıurfa Metropolitan Municipality, there is no need for expropriation.
Number of parcels subject to easement rights	Since the lands belong to Şanlıurfa Metropolitan Municipality, there is no need for easement.

1.2 Background Information on the Sub-Project

The sub-project was developed as six solar power plants on 4 separate parcels to be established separately by SUSKI. During the construction and operation phases, PIU of SUSKI will ensure compliance with national legislation and World Bank standards. Since the ŞUSKI SPP Sub-project is an on-land installation, an EIA evaluation was made according to the EIA regulation dated Nov 25, 2014, and the decision that EIA is not required was issued by Şanlıurfa Governorship Provincial Directorate of Environment and Urbanization, dated 08.10.2020 and with the decision number 64682694 220-02E-2020363.

According to the information obtained from the field visit, the local economy is based on agriculture and animal husbandry activities in all of the Aşık and Maşuk neighborhoods. Pistachio and olive production are dominant as agricultural activities. The products harvested in the region are offered to the markets in Şanlıurfa city center. The majority of animal husbandry activities consist of cattle breeding and poultry farming.

1.3 Sub-project Location

The areas where the sub-project activities will be carried out is located in the lots 1174, 1175, 1177 and 1181 of block 0, Aşık neighborhood of the Karaköprü district of Şanlıurfa province. It is approximately 23 kilometers away from the Şanlıurfa city center and approximately 7.5 kilometers away from Karaköprü District. The sub-project sites are accessible from two roads from the Adana-Şanlıurfa motorway located north of the sub-project site. Access to the subproject areas is provided by a 1.5-kilometer asphalt road branching off from the Adana-Şanlıurfa highway. Access to parcels which are 1174, 1175, 1177 and 1181 is provided by existing roads.

The lands where the sub-project activities will be carried out and the lands on the route where the planned ETL will pass belong to Şanlıurfa Metropolitan Municipality and have been allocated to ŞUSKI. As a result of the observations made within the scope of field visits and interviews with local people, it was determined that grazing activities were not carried out in the parcels where the sub-project area is located.

There are no private lands in the sub-project areas, but there are trees belonging to individuals within the planned SPP areas' borders in parcels 1175 and 1181. Interviews were conducted with 9 people who had trees on the lands in question. It was declared by the tree owners that there are 480 pistachio trees and 410 olive trees on 28000 m² of the 63965 m² parcel numbered 1175 where the sub-project

will be established, and 1400 pistachio trees and 60 olive trees on 42000 m² of the 138100 m² parcel numbered 1181. These trees were planted for income generation purposes, but no yield was obtained due to the soil characterization in the region. However, compensation for all of these trees to be moved was paid to the tree owners. However, the trees will be transferred to campus of the Directorate of Parks and Gardens of Şanlıurfa Metropolitan Municipality and the tree owners have been compensated for the cost of the trees so that they do not lose income. A protocol was signed between SUSKI and the tree owners regarding this issue and the prices of the trees were transferred to the tree owners.

A field visit was organized between 08.04.2025-11.04.2025 to meet with the tree owners and evaluate the compensation process. As a result of the interviews, the consensus of all 9 tree owners was that the amount of compensation paid covered the income loss. Details of the interviews are provided in the Abbreviated Land Acquisition Plan (ALAP) prepared for the sub-project. The trees within the boundaries' parcels 1175 and 1181 borders will be uprooted and moved to the area determined by Şanlıurfa Metropolitan Municipality Parks and Gardens Directorate.

1.4 Area of Influence

An analysis was conducted to assess the sensitive receptors of the sub-project during the pre-construction phase. As a result of the calculations of the AoI of the sub-project noise and dust emissions, it was concluded that they would be attenuated within 100 meters. However, for precautionary purposes, a distance of 200 meters was determined as the sub-project impact area.

The access route to the sub-project sites passes through the borders of both Aşık and Maşuk neighborhoods. There are lands belonging to Aşık and Maşuk neighborhoods on both sides of the access road. Communities located in the immediate vicinity of the sub-project area are likely to be affected by increased traffic volume, road safety risks, dust and noise. Additionally, individuals using or living in the vicinity of access roads to the sub-project area may be exposed to increased traffic volume and related safety risks. However, since it is planned that the personnel needed during the construction and operation phases of the sub-project will be recruited from the local community, the neighborhoods of Aşık and Maşuk are within the area of influence.

In addition, during field visits; it was determined that some panels in the existing 18 MW SPP panels were broken due to hunting activities. As a result of the interviews with the local residents, the mukhtar of Aşık neighborhood and the deputy mukhtar of Maşuk neighborhood, it was stated that hunting activities in the region have ended due to the newly built houses in or around the SPP area. Based on the closest point of the sub-project site, the residential construction located 150 m away is also within the AoI.

Considering all these elements, Aşık and Maşuk neighborhoods were determined to be within the social impact area.

The social impact area of the sub-project and neighboring facilities are as follows in the **Hata! Başvuru kaynağı bulunamadı..**

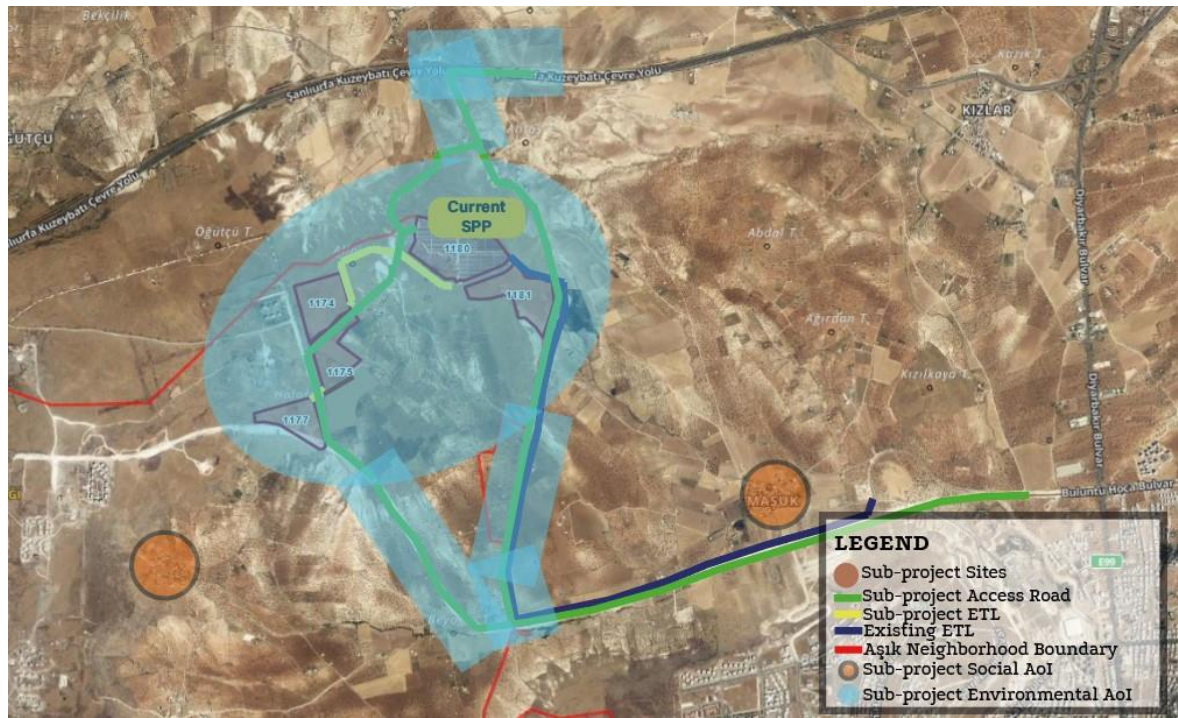


Figure 2 Sub-project Social AoI

2 OBJECTIVE / DESCRIPTION OF SEP

This Stakeholder Engagement Plan has been formulated to ensure that project-affected people and other interested parties and vulnerable groups that constitute the “stakeholders” are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about sub-project and its impacts.

The objectives of the Stakeholder Engagement Plan of SUSKI are as follows:

- To establish a systematic approach to stakeholder engagement that will help SUSKI to identify all interested parties and vulnerable groups and how they will be affected by sub-project and ensure that sub-project is implemented in a participatory and community-friendly manner through building and maintaining a continuous constructive relationship with them, in particular with all stakeholders; To assess the level of stakeholder interest and support for sub-project and to guide the relations of the SUSKI team with the stakeholders throughout the installation and operation process, enabling stakeholders’ views to be taken into account in project design and environmental and social performance;
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout sub-project life-cycle on issues that could potentially create an impact;
- To ensure that relevant sub-project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format;
- To provide all stakeholders with accessible and inclusive means to raise issues and grievances, and allow SUSKI to respond to and manage such grievances.

Stakeholder engagement plays a critical role for the successful completion of the sub-project, which has a wide stakeholder circle, from local people, vulnerable groups, public institutions, non-governmental organizations. SEP provides the framework for the stakeholder engagement and details the timing and methods of engagement with the different groups of stakeholders. SEP does not only identify the different stakeholder groups, but also identifies their needs and circumstances, and how they are being affected by the sub-project. The SEP pays special attention to identified disadvantaged or vulnerable individuals or groups, and determines how to ensure their inclusion in the stakeholder engagement activities. The SEP takes into account the main characteristics and interest of the stakeholders, and the different levels of engagement and consultation that is appropriate for different stakeholders, while defining the interaction with all stakeholders, also explores the opportunities and risks brought by interaction with them.

SEP increases awareness of the sub-project, identifies stakeholders’ views, ensures that their opinions and concerns are taken into consideration, and increases trust in the sub-project processes. This SEP aims to support SUSKI in identifying its stakeholders and fostering constructive relationships, particularly with those affected by the sub-project.

SEP promotes effective and inclusive engagement with affected parties throughout the subproject lifecycle, addressing potentially impactful issues. It ensures that information on the subproject and impacts are disclosed in a timely, understandable, and accessible manner. Additionally, the SEP provides affected parties with inclusive tools to voice concerns and grievances, enabling SUSKI to respond and manage these effectively. By creating a transparent and respectful environment, the SEP encourages the inclusion of diverse cultural norms and engagement capacities, fostering fair and open dialogue to address stakeholder concerns engagement.

SEP has been developed to comply with both national legal requirements and World Bank's Environmental and Social Standard 10 (ESS10). This sub-project-specific SEP is a living document that will be regularly updated based on ongoing discussions and engagement with stakeholders, reflecting their views and input throughout the sub-project.

3 STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder engagement is an inclusive process that will be carried out throughout the sub-project life cycle. When professionally designed and implemented, it supports the establishment of strong, constructive and responsive relationships that are essential for the successful management of a sub-project's environmental and social risks.

The purpose of stakeholder identification is to identify which stakeholders may be directly or indirectly affected - positively or negatively - ("project affected parties") or have an interest in the Sub-project ("other interested parties"). Effective stakeholder engagement requires identifying who the stakeholders are, understanding their needs and expectations, and their priorities and goals for the sub-project. This information was then used to tailor the engagement to each type of stakeholder.

As stated in WB ESS10, stakeholder definition is divided into three groups;

- Are affected or likely to be affected by the project (project-affected parties); and
- May have an interest in the project (other interested parties);
- Vulnerable/disadvantaged groups/individuals.

3.1 Methodology

To follow best practices in stakeholder engagement, the subproject will apply the following principles:

- **Openness and Life-cycle Approach:** Public consultations will be held throughout the entire subproject life cycle in an open and transparent way, ensuring that there is no outside influence, manipulation, or intimidation.
- **Informed Participation and Feedback:** Relevant information will be shared with all stakeholders in an accessible format; opportunities will be provided for communicating stakeholder feedback and for analysing and addressing comments and concerns.
- **Inclusiveness and Sensitivity:** Stakeholder identification will be undertaken to support better communications and build effective relationships during the subproject cycle. The participation process for the subprojects will be inclusive. All stakeholders at all times will be encouraged to be involved in the consultation and subproject implementation process. Equal access to information of all stakeholders will be provided to all stakeholders. Sensitivity to stakeholders' needs will be the key principle underlying the selection of engagement methods. Special attention will be given to vulnerable or disadvantaged individuals/groups that may be at risk of being left out of subproject benefits and the cultural sensitivities of diverse ethnic groups.
- **Flexibility:** Where social distance, cultural context, or governance factors preclude traditional face-to-face forms of engagement, the Subproject's subproject's stakeholder communication strategy methodology will accommodate alternative forms of engagement, including various internet or telephone-based communication forms.

During the mapping process of the stakeholders, the nature of the sub-project impacts are identified, and the methods and frequencies of the relations to be built with stakeholders are formulated. In order to ensure a meaningful consultation process regarding the sub-project, it is crucial to identify relevant stakeholders. In this context, a site visit was conducted by the Environmental Specialist of CA Engineering firm on October 3-4, 2024. During the site visit, meetings were held with SUSKI officials, and information about the sub-project sites was gathered through on-site inspections. In this

regard, meetings were conducted with the mukhtar of Aşık neighborhood and the deputy mukhtar of Maşuk neighborhood.

In order to facilitate stakeholder identification and better understand the region, a "Community-Level Survey Form" was conducted with the representatives of both neighborhoods. Discussions with the mukhtars included topics such as the demographic status of the neighborhoods, their perspectives on the existing SPP operated by SUSKI, and their opinions, suggestions, and concerns regarding the upcoming sub-projects. Meetings also covered the socio-economic and demographic structures, as well as infrastructure services, of Aşık and Maşuk neighborhoods.

Additionally, individual consultations were held with four residents of Aşık neighborhood and six residents of Maşuk neighborhood to gather their opinions, suggestions, and concerns about the sub-project.

During field visits on 03-04 October 2024, the presence of unauthorized users was detected on plots numbered 1175 and 1181 of block 0, the presence of informal users was identified. Within the parcel boundaries, olive and pistachio trees were observed. Discussions with local residents included consultations with the tree owners.

All data specified in the report were processed based on the mukhtar interviews conducted during the field visit and the information received from the local people. All stakeholders are categorized as high, moderate or low depending on the extent to which stakeholders are affected by and/or affect the sub-project and their level of interest and influence in the sub-project. The meetings held with the mukhtar, local residents, and tree owners are presented in a Table 3.

Table 3 Meetings with local residents and tree owners

Date	Interview
03-04 October 2024	Mukhtar of Aşık Neighborhood / Local Residents Maşuk Neighbourhood Council Member / Local Residents
8-11 April 2025	Tree Owners

3.2 Project Affected Parties

The term "project-affected parties" (PAP) refers to individuals or groups who are likely to be affected by the sub-project due to direct impacts or potential risks on their physical environment, health, safety, cultural practices. PAPs have a high level of interest in receiving information about the sub-project, staying updated on developments, being included in sub-project processes, and having the local community meet the workforce needs. However, as they are not expected to be significantly affected by the sub-project activities, their impact level is moderate.

The key PAPs who will be cooperated with during the sub-project, including individuals, groups and communities are:

- Residents of Aşık and Maşuk Neighborhoods, given which settlements are closer to the sub-project sites,(There are 814 people living in the Aşık neighbourhood and 35 people living in the Maşuk neighbourhood)
- Informal users (9 people) of the lands allocated to the sub-project are residents of Aşık neighborhood,
- Local businesses in the process of supplying materials and equipment,
- Subproject workers (Construction workers: 125, Operation workers: 12)

3.3 Other Interested Parties

Other interested parties comprise persons, groups and others who may be interested in the SPP Project because of its location, its proximity to natural or other resources, or because of the sector or parties involved in the sub-project. This may include public administrations, local government officials, community leaders, media representatives and non-governmental organizations (NGOs). Non-Governmental Organizations (NGO) were identified as other interested parties due to their roles in facilitating communication across communities, shaping public opinion, and improving outreach to different social groups. Their involvement also contributes to addressing local concerns through direct engagement.

Public Institutions

Specific opinions of national and local government institutions regarding sub-project design, construction and operation processes may be sought; in this case, interest levels are determined as moderate and impact levels are determined as low.

- Ministry of Labor and Social Security
- General Directorate of Labor
- General Directorate of Occupational Health and Safety
- Şanlıurfa Governorship
- Social Security Institution Provincial Directorate
- Provincial Directorate of Environment, Urbanization and Climate Change
- Şanlıurfa Provincial Directorate of Civil Society Relations
- Karaköprü District Governorship
- Dicle EDAS

NGOs

These foundations, associations and chambers can express their special opinions about the sub-project and create public opinion, therefore their interest level is high and their impact level is low

- Şanlıurfa Governorship Environmental Protection Foundation
- Şanlıurfa Environmental Foundation
- TES-İŞ Şanlıurfa Branch
- Karacadağ Development Agency
- Şanlıurfa Evren Small Industrial Site Construction Cooperative

Keeping regular relations with media stakeholders is sufficient to deliver regular information in Şanlıurfa Province, at local and national level. In any case, media play an important role in the public information and creation of public perception on the sub-project. Local and regional media agencies engaged in the sub-project field are as follows:

Local Press

It is important to cooperate with local and regional media institutions to effectively inform and consult the public, therefore the level of interest is determined as moderate and the level of impact is low

- Sanliurfa Newspaper
- GAP Gündem Newspaper
- Baraj Newspaper
- Değişim Newspaper
- Yeniurfa Newspaper
- Gazete İpekyol Newspaper
- Urfanatik Newspaper

National Press

- Anadolu Agency
- Ihlas News Agency
- Demirören News Agency
- Ilke News Agency

University

When research needs to be conducted within the scope of the sub-project, universities are one of the key stakeholders. Therefore, the level of interest is determined as low and the level of impact is determined as low.

- Harran University

3.4 Disadvantaged/Vulnerable Individuals or Groups

Disadvantaged or vulnerable individuals or groups are those who often do not have a voice to express their concerns or understand the impacts of a sub-project, and who may have particular limitations in participating in and/or understanding the sub-project information or participating in the consultation process. Limitations may relate to language differences, lack of transportation to events, accessibility of venues, lack of understanding of a consultation process, and difficulties in accessing information.

Vulnerable/disadvantaged individuals and/or groups within the potentially affected areas of the SPP project may comprise of refugees, children, the disabled, and the elderly. Vulnerable groups are important stakeholders and it is a priority to find modes of engagement in terms of language, access, venue and time which will enable them participate fully in the stakeholder engagement activities. Likewise, it is important to consider how these groups normally access information, through which media and language.

Moreover, the equal participation of vulnerable/disadvantaged groups in the stakeholder engagement activities of the sub-project at par with other stakeholder groups is also expected. Their participation, inputs and needs will inform sub-project design and implementation.

Vulnerable and disadvantaged groups are determined to have a high level of impact from sub-project activities on their daily lives, economic conditions, or health. However, they demonstrate a low level of interest in being informed about the sub-project activities, being involved in these activities, receiving the necessary support to ensure their participation, and having the opportunity to express their opinions and grievances.

At this stage, according to the information obtained from the interviews with the mukhtar of Aşık neighborhood, the deputy mukhtar of Maşuk neighborhood and the local people within the scope of the field visit for the sub-projects managed by SUSKI, the vulnerable and disadvantage individuals and/or group are given separately for each neighborhood in Table 4.

Based on the information obtained and interviews conducted with mukhtars of Aşık and Maşuk Neighborhoods and informal users of parcels 1175 and 1181 during the field visit held on 03-04 October 2024, stakeholder definition is given in Table 4.

Table 4 Vulnerable and Disadvantage Group living in Aşık and Maşuk neighborhoods

Vulnerable and Disadvantage Group	Number of People	
	Aşık Neighborhood	Maşuk Neighborhood
Illiterate individuals	40	5
People over 70 years of age	21	-
People with chronic diseases or those in need of care who require constant medical attention	100	-
Female-head of households	5	-
Women with low literacy rates	2	-
Total	168	5

Source: The data was collected from the Mukhtar and Council Members.

Vulnerable and disadvantaged individuals and/or groups will be provided with all the abstract and concrete opportunities they need to be informed about the sub-project and to share their views on the sub-project.

- **Illiterate individuals:** Illiterate individuals are included in the vulnerable and disadvantaged individuals/groups because they are more limited than other individuals in accessing information about the sub-project, sub-project-related announcements, or grievance mechanisms.
- **People over 70 years of age:** Individuals over the age of 70 are more limited than other individuals in participating in sub-project activities and communicating their rights and views due to reasons such as physical capacity, limited access to sub-project channels, health problems due to age, etc.
- **People with chronic illnesses or in need of special care:** These individuals may be affected by dust and noise generated by the project. In this case, if their economic situation is poor, they may experience difficulties in accessing health services.
- **Female-head of households:** Female heads of households are more involved in social life due to the lack of individuals in the family structure, as they are solely responsible for caring for their children. For this reason, they may face difficulties in being informed about meetings and attending them.
- **Women with low literacy rates:** Considering the social structure of the region, it is evident that it is a male-dominated society. Women's participation in social life may be limited based on the social structure of the region. In addition, when literacy rates are low, women may be at a disadvantage in terms of being informed about participation meetings and obtaining information about their rights.

The difficulties experienced by these groups lead to deeper social inequalities and require support through social policies. Details of vulnerable and disadvantage individuals/groups according to the information obtained from Mukhtar and Council Member of Aşık Neighborhood and from Mukhtar and Council Member of Maşuk Neighborhood are given in Table 5.

Table 5 Stakeholders Identification

Stakeholder Group			Level of Interest	Level of Influence
Stakeholder	Project Affected Parties	- Residents of nearest settlements (814 people living in the Aşık neighbourhood, 35 people living in the Maşuk neighbourhood) - Tree Owners (9 person) - Subproject Workers - Şanlıurfa province and Local Businesses in Karaköprü district	High	Moderate
	Other Interested Parties	Public Institutions Ministry of Labor and Social Security - General Directorate of Labor - General Directorate of Occupational Health and Safety - Şanlıurfa Governorship - Social Security Institution Provincial Directorate - Provincial Directorate of Environment, Urbanization and Climate Change - Şanlıurfa Provincial Directorate of Civil Society Relations - Karaköprü District Governorship - Dicle EDAS	Moderate	Low

		NGOs • Şanlıurfa Governorship Environmental Protection Foundation • Şanlıurfa Environmental Foundation • TES-İŞ Şanlıurfa Branch • Karacadağ Development Agency • Sanliurfa Evren Small Industrial Site Construction Cooperative	High	Low
		Local Press • Sanliurfa Newspaper • GAP Gündem Newspaper • Baraj Newspaper • Değişim Newspaper • Yeniurfa Newspaper • Gazete İpekyol Newspaper • Urfanatik Newspaper National Press • Anadolu Agency • İhlas News Agency • Demirören News Agency • İlke News Agency	Moderate	Low
		University Harran University	Low	Low
	Disadvantaged of vulnerable individuals or groups	• Illiterate (45 people), • People over 70 years of age (21 people), • People with chronic diseases or those in need of care who require constant medical attention (100 people), • Female-head of households (5 people), • Women with low literacy rates (2 people),	Moderate	High

4 STAKEHOLDER ENGAGEMENT PROGRAM

The main objectives of the stakeholder engagement programme and the planned timetable for the various stakeholder engagement activities are to define at what stages and at what intervals these activities will be carried out throughout the life of the sub-project. Information is provided on how the public will be made aware of future opportunities to review information and provide their views, if decisions about public meetings, locations and timing of meetings have not yet been made.

4.1 Summary of Stakeholder Engagement Done During Sub-Project Preparation

A field visit was carried out on 3-4 October 2024 in order to inform the local people about the sub-project, to obtain their opinions and suggestions, and to make observations in the sub-project sites. Information was obtained from the Aşık neighborhood mukhtar, the Maşuk neighborhood deputy mukhtar about the demographic structure of the neighborhoods, infrastructure services, socio-economic status, vulnerable and disadvantaged groups. Field interviews were held with SUSKI officials about the usage status of the sub-project area, the parts of the SPP area where pistachio and olive trees are located, and the existing SPP.

The presence of pistachio and olive trees was detected in an area of 350 m² and 980 m² in parcels numbered 1175 and 1181, respectively. In this context, interviews were also conducted with the tree owners. The lands of the tree owners are shared lands and have more than one shareholder. In order for the shareholders not to suffer any income loss due to the sub-project, it was decided to transfer the trees in accordance with the agreements made with SUSKI.

In addition, within the scope of the Stakeholder Engagement Plan, a "Community Level Survey" was conducted by the ÇA engineering environmental expert on 03-04 October 2024 with the Aşık neighborhood mukhtar and the Maşuk neighborhood mukhtar.

A second field visit was made by ÇA Engineering Social Expert and Environmental Expert between 08-11.04.2025. A meeting was held with the all-tree owners to evaluate the compensation process, their opinions, suggestions and concerns. There are 9 tree owners.

Interviews were held with 4 people living in the Aşık neighborhood and 6 people living in the Maşuk neighborhood regarding their opinions, suggestions and concerns about the sub-project. In the interviews with the mukhtar and local people, they expressed their positive views because they were familiar with the current SPP and the employment opportunities provided to the neighborhood.

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

Stakeholders have been identified within the scope of the sub-project and consultations or key information meetings have been held with these stakeholders. Stakeholders identified in the region have been informed about the location, components and content of the sub-project.

This plan shows the nature and level of stakeholder interest in the sub-project, how the participation will be conducted, the frequency of participation and the responsible unit of SUSKI, and the following matrix provides a tabular version of this program.

The SEP will be implemented at the sub-project level. Consultation Forms (Annex D) and the minutes of the meetings of those who participated in the consultations will be recorded but will be made publicly available as an annex to the SEP. When the SEP is disclosed, relevant data containing personal data will be blurred, taking into account the Personal Data Protection Law.

All supporting documentation for stakeholder activities (newspaper notices, attendee list, full meeting minutes (as an annex), sample brochure) will be included in the SEP.

The SEP **Hata! Başvuru kaynağı bulunamadı.** presents the nature and level of stakeholders' interest in sub-project and the ways the engagement will be conducted, the engagement frequency and the responsible unit of SUSKI.

4.3 Stakeholder Engagement Plan

The main objectives of the stakeholder engagement program are to provide early information, explanation and consultation on various sub-project documents and activities in order to establish a dialogue with sub-project stakeholders from planning to implementation and operation.

SUSKI will ensure that the sub-project is communicated to all stakeholders and that meaningful participation and consultation activities are carried out. The following information should be included when documenting the stakeholder engagement activities to be carried out within the scope of the sub-project:

- Date(s) and location(s) of the consultation(s) and related notification(s) (newspaper advertisements, screenshots of social media announcements, etc.)
- Participant details (as per the Personal Data Protection Law),
- Meeting schedule/program (as well as information on what was presented and by whom),
- Summary meeting minutes (comments, questions and responses from presenters),

Review of comments, agreed actions, issues requiring follow-up actions and activities, including clarification of how stakeholders were informed about decisions taken (Table 7).

SUSKI will make the subproject E&S documents available in both Turkish and English on its website. These documents can also be accessed at the SUSKI. Furthermore, subproject posters and information on the grievance mechanism will be displayed at local points, including the Mukhtar's Office in Aşık and Maşuk Neighborhoods. A Stakeholder Consultation Meeting will be organised to inform the public about the identified environmental and social risks of the subproject. The report will then be updated by adding the information about the meeting to SEP.

4.4 Reporting back to stakeholder groups

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

Different information methods and tools can be used to increase the level of information for each of the stakeholder groups. In particular, for public consultation meetings, the meeting place(s), time and date will be set and this information will be announced to the public at least ten (10) days before the meeting, through the SUSKI website, text messages, local and national newspapers, posters and brochures printed and hung in the mukhtar offices ensuring that all community members are informed about the meeting to be held. This announcement will be made through various channels,

including posters hung in mukhtars' offices, tea houses, and the municipality building, brochure distribution, and SMS via national and local mass media.

The PIU will take special measures to ensure that vulnerable and disadvantaged individuals/groups have equal opportunities to access information, provide feedback or voice their grievances. In addition, the timing of these meetings for stakeholders who are working will be arranged in a way that they can also participate in the consultation events or alternative solutions will be produced for them. The following additional support or resources will be provided for these people to participate in stakeholder engagement activities. The following measures should be taken at this point:

- Providing written materials related to sub-project information in larger fonts and Braille,
- Selecting accessible venues for consultation events and/or providing transportation for people in remote areas (e.g. villages),
- Organizing small events or meetings for vulnerable/disadvantaged people depending on their sensitivity (e.g. a small meeting with hearing impaired individuals accompanied by a sign language expert),
- The timing of the consultation events should be arranged in a way that working stakeholders can participate.

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

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

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

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

ŞUSKI will notify Aşık and Maşuk Neighborhoods' mukhtar's offices located in the impact area two days in advance of any possible temporary road closures caused by construction works. Similarly, ŞUSKI will inform the affected local people of the future works in ŞUSKI and Karaköprü District Governorship buildings and/or on the notice platforms two days in advance.

ŞUSKI will be responsible for engagement with stakeholders as an on-going process throughout the life of the sub-project. Stakeholder logs will also be filled out for engagement activities (Table 6).

Table 6 . Sample Table for Stakeholder Engagement Log

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

A summary of the implementation of the grievance mechanism will be published annually on ŞUSKI's website³ after removing the identity information of the persons to protect their identity.

All stakeholders will be able to share their opinions and grievances via a range of options such as ŞUSKI's website, letters, and face to face meetings with the implementation of the SEP.

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

³ <https://www.suski.gov.tr>

Table 7 Stakeholder Engagement Plan

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
Pre-construction	Once 3 months	Information Statement - General information about the purpose, stages, Sub-project and E&S impacts/risks - Purpose, start date, duration and nature of land preparation, construction and operation activities - Implementation of mitigation measures related to relevant social and environmental impacts/risks - Grievance Mechanism - Information (ESMP, ALAP and SEP) on SUSKI website for review.	- Stakeholder Consultation Meeting - Face to face meetings - SUSKI's website - Social Media - Notice Boards - Booklets etc. - Posters to be hung in mukhtars' offices etc.	Resident of Aşık and Maşuk neighborhoods, Local government, Local business	- Supervision Consultant, SUSKI, - Sub-project Contractors
		Employment and Supply Strategies - Hiring employees - Staff training - Purchasing materials and services - Grievance Mechanism	- Stakeholder Consultation Meeting - SUSKI's website - Social Media - Notice Boards - Booklets etc. - Posters to be hung in mukhtars' office etc.	Local businesses,	
Construction	Once 3 months	Information Statement - Monitoring targets and activities to be carried out - Monitoring targets and activities and regular reporting of monitoring results to takeholders.	- Stakeholder Consultation Meeting - SUSKI's website - Social Media - Notice Boards - Booklets etc. - Posters to be hung in mukhtars' office etc.	Residents of Aşık and Maşuk Neighborhoods, Local government, Local business	- Supervision Consultant, SUSKI, - Sub-project Contractors

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		Traffic and Transportation Management - Road safety awareness, including safe passage through bypasses and connecting roads - Types, number and frequency of vehicles to be used during construction - Collaboration with local communities and responsible authorities to improve signage, visibility and overall road safety, especially along roads near schools or other places where children are present, - Planning and timing of construction activities on roads, - Regarding training on traffic and pedestrian safety cooperating with local communities (e.g. school education campaigns) - Traffic measures and sub-project road use sharing with association president - Grievance Mechanism	- Depending on the demands of the stakeholder group, - Posters to be hung in mukhtars' office etc., - SUSKI's website	Mukhtars and residents of Aşık and Maşuk Neighborhoods	
Operation	In case of demand or significant change	Information Statement - Monitoring targets and activities to be carried out - Monitoring targets and activities and regular reporting of monitoring results to stakeholders - General information about the subproject, environmental and social	- Depending on the demands of the stakeholder group, - Posters to be hung in mukhtars' office etc., - SUSKI's website	Residents of Aşık and Maşuk Neighborhoods,	SUSKI

Project Stage	Estimated Date/Time Period	Topic of Consultation/ Message	Method Used	Target Stakeholders	Responsibilities
		impacts, mitigation measures, monitoring activities of the subproject Grievance Mechanism			

5 RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Project Implementation Unit (PIU)

PIU will be established within SUSKI and will consist of SUSKI personnel. The duties and responsibilities of PIU are explained in Table 8.

The PIU team will consist of a project coordinator responsible for overall subproject management, interdepartmental coordination and reporting to relevant authorities; a technical expert-engineer responsible for supervising technical implementation and ensuring that construction and infrastructure works comply with standards; an E&S expert responsible for supervising the implementation of environmental and social protection measures, including stakeholder participation and complaints management; a procurement and finance officer to manage procurement procedures and oversee the use of financial resources in accordance with the project budget; and a communication officer who coordinates communication with stakeholders and ensures timely transfer of project-related information to relevant parties. A sufficient budget will be allocated for communication and grievance mechanism to be established with stakeholders. The budget is included in the sub-project budget.

5.2 Resources

SUSKI will mobilize human and material resources to implement the SEP and manage the Grievance Mechanism (GM). SEP and GM activities will be led by SUSKI's PIU. SUSKI's PIU will be primarily responsible for coordinating stakeholder engagement activities with the Contractors as outlined in this SEP. The collection of grievances, questions and feedback will be the direct responsibility of the GM contact person (GMCP) of the PIU.

The material resources that SUSKI will mobilize are:

- Sub-project specific page on SUSKI website;
- Agrievance database;
- Stakeholder engagement records;
- Printed documents (guides, brochures, posters etc.) to be used in accordance with the SEP.

5.3 Management Functions and Responsibilities

SUSKI PIU is the main responsible for the implementation of sub-project and PIU will have designated staff responsible for SEP and GM. The roles and responsibilities of these actors/stakeholders are summarized in the Table 8.

Table 8 Roles and Responsibilities

InstitutionActor/	Roles and Responsibilities
PIU of ŞUSKI	• Planning and implementation of the SEP; • Leading stakeholder engagement activities in close collaboration with the ILBANK; • Management and resolution of grievances • Consultation on specific SEP activities; • Announcing the important construction activities (such as road closures and service interruptions); • Reporting on implementation of SEP activities to ILBANK; • Proper implementation of the grievance mechanism defined in the SEP,

Institution/Actor/	Roles and Responsibilities
	• Executing defined grievance mechanism in the SEP properly and informing ILBANK about the overall implementation status.
GMCP	• Act as a focal point for the GM in the PIU, • Keep records and monitor sub-project-related grievances, • Manage and coordinate the resolution process of sub-project related grievances, • Review grievance records for relevant non-compliance issues or recurring issues related to stakeholder engagement and other sub-project activities, • Coordinate and monitor PIU contacts at the contractor level, • Collect sub-project related grievances from all different parties, • Inform PIU and management about the resolution process, • Prepare compiled PIU reports on the sub-project, • Monitor contractors' grievance records and grievance resolution process and report to PIU in monthly progress reports, ▪ Maintain communication with PIU to respond/resolve grievances
Supervision Consultant	• Ensure that the subproject complies with the methodology and other requirements specified in the E&S Documents during the implementation of sub-projects, • Recording and monitoring the resolution of grievances from contractors and reporting them to SUSKI (PIU) in the monthly progress reports
Contractors/sub-contractors	• Inform SUSKI on any issues related to engagement with stakeholders • Maintaining communication with PIU GM Focal Point to follow up on grievances, • Developing and implementing a grievance mechanism for both the E&S performance of the project and the workforce, including subcontractors, prior to the commencement of works in accordance Submits monthly Environmental and Social Monitoring Reports (ESMRs) to SUSKI

6 GRIEVANCE MECHANISM

The purpose of the Grievance Mechanism (GM) is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The purpose of the public grievance mechanism and the workers grievance mechanism is to provide access to a grievance resolution procedure for Subproject affected people, including communities and Subproject workers. Managing, preventing, minimizing and effectively addressing and resolving complaints, ensuring that the solution is acceptable to both parties (SUSKI and the Complainant) and resolved and responded to within 30 days are integral parts of a sound stakeholder engagement strategy. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Sub-Project worker's, local communities, and other stakeholders.

In the Sub-Project Level Grievance Mechanism, Public Grievance Mechanism and Workers' Grievance Mechanism, grievances will be submitted in Turkish through Turkish forms. In addition, if a stakeholder who does not speak Turkish but have grievances about the environmental and social performance of the subproject or, necessary language support will be immediately provided by SUSKI.

The structured GM will ensure that grievances associated with the Sub-Project are addressed through a transparent and impartial process. The public will be informed about the GM through the disclosure and consultation of the SEP and through the stakeholder engagement activities to be conducted throughout the life of the subproject.

6.1 Grievance Mechanism at National Level

The intake channels for the existing national level GMs are provided below:

Presidential Communication Center (CIMER): The Presidency's Communication Centre (CIMER) has been providing a centralized complaint system for Turkish citizens, legal persons and foreigners. CIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **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 Center (YIMER): The Foreigners Communication Center (YIMER) has been providing a centralized complaint system for foreigners. YIMER will be available to sub-project stakeholders as an alternative and well-known channel for conveying their sub-project-related grievances and feedback directly to state authorities.

- **YIMER Website:** www.yimer.gov.tr
- **YIMER Call Centre:** 157
- **YIMER Phone Number:** +90 312 5157 11 22

- **YIMER Fax Number:** +90 0312 920 06 09
- **Address for Official Letter:** Republic of Türkiye General Directorate of Migration Management, Çamlıca Mahallesi 122. Sokak No: 4 Yenimahalle/Ankara
- **Mail addressed to Republic of Türkiye, Directorate of Communications**
- **Individual applications at the Republic of Türkiye General Directorate of Migration Management**

ILBANK Grievance Mechanism: ILBANK has established a transparent and comprehensive GM in September 2021 in order to receive, evaluate and address grievances pertaining to every international project it finances, and relevant mechanism will be in place during the course of the Sub-project. Complainants may - if they wish - submit their grievances to ILBANK as a higher authority through the following communication channels:

- **ILBANK Website:** <https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi>
- **ILBANK E-mail:** uidbbilgi@ilbank.gov.tr and pybsosyal@ilbank.gov.tr
- **ILBANK Phone number:** +90 312-508 79 79 / +90 312-508 79 80
- **ILBANK Address for Petition Service:** ILBANK Department of Financial Institutions and Investor Relations, GM Team (letters must be marked as personal or confidential) Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/Ankara

Any grievance and feedback lodged/conveyed through CIMER and/or YIMER related to the sub-project will be registered in the GM database and managed as per GM Procedures, as relevant, by observing the requirements stipulated by the Law on the Protection of Personal Data (Law No. 6698, 2016).

6.2 Sub-project Level Grievance Mechanism

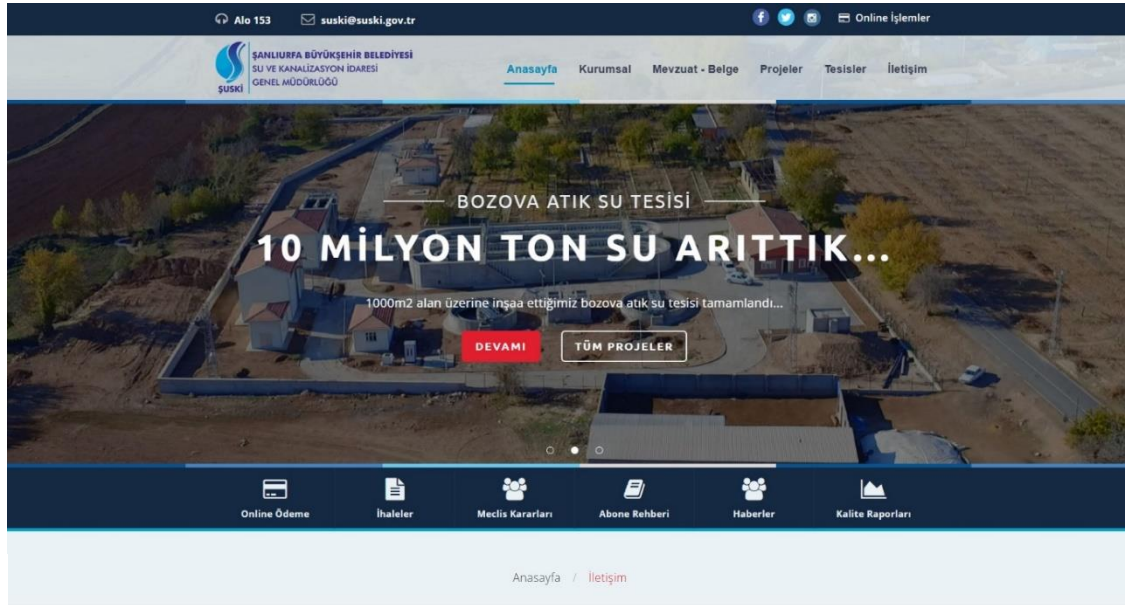
As part of the stakeholder participation, information and consultation process, an effective and accessible grievance mechanism is required to be established. The purpose of the grievance mechanism is to provide channels free from manipulation, coercion and intimidation through which local community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

SUSKI handles public grievances and views through its website and complaint hotlines. This municipal GM system was established to receive grievances and requests from local citizens and intended to produce possible solutions within SUSKI for reported concerns. SUSKI's website includes a communication page, which is the mechanism where grievances/requests regarding SUSKI activities are submitted (see **Hata! Başvuru kaynağı bulunamadı.**). In addition, many sections of the homepage of SUSKI's website include information about social media accounts and telephone numbers (such as the Alo 153) to which grievances can be submitted.

- **SUSKI's e-mail address:** bilgi@suski.gov.tr
- **SUSKI's Website Address:** <https://www.suski.gov.tr>

- **ŞUSKI Call Centre:** [90 \(414\) 318 58 00](tel:904143185800)
- **ŞUSKI's Address:** Ertugrul Gazi Neighborhood, Necip Fazil Kısakurek Street. No: 35 D: C, 63300 Haliliye/Sanlıurfa

SUSKI website includes a communication page, which is the mechanism where grievances/requests regarding SUSKI activities are submitted and the resolution process is followed (see **Hata! Başvuru kaynağı bulunamadı.**).



BİZE ULAŞIN

Adres

Ertuğrul Gazi Mah. N.Fazıl Kısakürek Cad. No:35/C Haliliye / Şanlıurfa

Telefonlar

Alo: 185
Telefon: 0 (414) 318 58 00
Faks: 0 (414) 318 58 08

Email

suski@suski.gov.tr

GÖNDER



ARABULUCULUK İLETİŞİM BİLGİLERİ

Adres :

ŞANLIURFA SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĞÜ / Hukuk Müşavirliği
Ertuğrul Gazi Mah. Necip Fazıl Kısakürek Cad. No:35/C Haliliye / ŞANLIURFA

Telefon: 0 (414) 318 58 00 Dahili: 4548

Faks: 0 (414) 318 58 08

Email: arabuluculuk@suski.gov.tr

KEP (Kayıtlı Elektronik Posta) Adresi: suski@hs01.kep.tr

UETS (Ulusal Elektronik Tebligat Sistemi) Adresi: 35436-46349-70664

(KEP Adresi, resmi kurumlar arası elektronik yazışmalar içindir.)

BİLGİ NOTU:

İdaremizin taraf olduğu arabuluculuk başvurularında sürecin daha etkin ve hızlı işletilebilmesi için;

1. İdareyi temsil eden Komisyonun gerekli ön araştırmaları yaparak toplantıya hazırlıklı

katılabilmesi için;

a. "ARABULUCULUK İLK TOPLANTI DAVET MEKTUBU" ile birlikte

b. Uyuşmazlık konusunun yer aldığı başvuru dilekçesinin ve/veya uyuşmazlık konusu ile ilgili somut bilginin de mutlaka mail yoluyla arabuluculuk@suski.gov.tr adresine veya posta yoluyla yukarıda yazılı kurumsal adrese gönderilmesi,

2. İlk toplantı günü belirlenirken yukarıda verilen iletişim kanalları yoluyla görüşme uygun günü tespiti için iletişime geçilmesi, önem arz etmektedir.

DİĞER İÇERİKLER



İLETİŞİM



ARABULUCULUK İLETİŞİM BİLGİLERİ

Figure 3. Screenshot of SUSKI's Website

Apart from the ILBANK Grievance Mechanism and in addition to all existing GMs at national level, a grievance mechanism will be established by SUSKI in order to receive, resolve and follow the concerns and complaints of the Sub-project affected communities as sub-project level. Grievance Mechanism (GM) as per WB will be implemented by SUSKI throughout the lifetime of the sub-project including pre-construction, construction, and operation phases. SUSKI PIU and construction contractor will be accessible for the stakeholders and will be responsible to respond to all grievances (complaints, requests, opinions, suggestions) in line with the ILBANK GM Procedure (2 days registration, 10 days evaluation, 15 days response). Relevant grievances will be monitored by the ILBANK GM Team. The personnel to be appointed by SUSKI 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 in as described above, within the scope of this subproject, there will be different levels of GMs to be operationalized by different institutions and subproject parties. All GMs to be utilized in this subproject will follow the process flow. SUSKI personnel will record all grievances received through different GM channels presented in this SEP (including all verbal and written grievances even through the grievance boxes installed in the municipal building and any stakeholder engagement event/meeting) in their GM log.

The grievances, requests, suggestions and opinions of the public will be recorded through the GM contact person (GMCP) to be assigned by SUSKI. All grievances are examined to be classified according to whether they are real or not and whether they are related to sub-project activities. If a grievance is deemed unsuitable for investigation because it is not genuine or not related to sub-project activities, the complainant will be provided with an explanation as to why the grievance could not be followed up. Grievances received within SUSKI are evaluated and forwarded to the relevant units. Appropriate grievances are responded to according to the sub-projects social and environmental requirements defined in SEP.

Any grievances received by Contractor, CİMER, YİMER, İLBANK, WB etc. will be also directed to SUSKI's call center and SUSKI's subproject level grievance mechanism. Samples of grievance form

and grievance closure and consultation form prepared for use within the scope of the Sub-Project are given in Annex B: Sample Grievance Form, Annex C: Sample Grievance Close Out Form and Annex D: Sample Consultation Form respectively.

All grievances submitted through phone calls, emails, face-to-face meetings, or the Website are recorded upon receipt. Within two (2) business days, the Grievance Mechanism Contact Person (GMCP) shall notify the complainant that the grievance has been received and is under evaluation.

The complainant shall be contacted within ten (10) business days to explain the process and provide an initial response. If needed, consultations with relevant stakeholders will be held, and the complainant will be informed about the methodology used to address the grievance.

Each grievance will be handled with diligence, fairness, and impartiality. If the proposed solution is accepted by the complainant, corrective actions will be taken within 15 business days. The grievance will be closed following implementation, and the complainant will be notified through a third and final communication. All related documentation (Grievance Form, Closure Form, etc.) will be archived.

All grievances other than urgent grievances will be resolved within 15 days. In case of delays, the reasons will be documented and reported. Grievances from contractors or subcontractors will be reported to GMCP by their E&S Specialist and entered into the Grievance Registry and Database on the same day, where they will be accessible to the PMU. The Grievance Tracking Table will include complainant details, dates, communication method, grievance status (open/reviewed/closed/rejected), and relevant explanations.

Throughout the process, all communications will be documented using Consultation Forms (see Annex-D). If a grievance is rejected or not resolved satisfactorily, it will be reconsidered, and revised decisions may be proposed. The Project Implementation Units (PIUs) are responsible for consolidating, monitoring, and reporting grievance data monthly.

Management of Sexual Exploitation and Abuse/Sexual Harassment issues:

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

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

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

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

6.3 Grievance Mechanism for Workers

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

Employees are informed about employee rights, basic occupational health and safety, the grievance mechanism and its operation at the time they start work. An up-to-date list of contact points is available in employee handbooks and/or bulletin boards. All processes related to the grievance mechanism are conveyed in a language that employees can understand.

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

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

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

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

Table 9 Grievance Mechanism Flow Chart

Grievance Process	Requirement / Action
Submission of a complaint	Receiving the grievance by any communication channel explained above. (At this point, if the complaint is a sensitive complaint involving child abuse, sexual harassment abuse or Gender Based Violence (GBV) immediate action will be taken within 2days after receiving of the complaint. For the cases relevant to sexual exploitation and abuse/sexual harassment at workplace or any potential child abuse in the sub-project sites, the complaint will be directed by the GM focal point (based in ILBANK headquarter) to relevant legal authorities/service providers such as Ministry of Family and Social Services and Prosecutors Office.”)

Grievance Process	Requirement / Action
Registration of complaint	Registering/recording through making an entry in the sample grievance register table. All the complaints will be registered within two working days and feedback will be given to the complainant. If the complainant requests that this complaint be treated anonymously, this complaint will be recorded anonymously and the request will be met.
Forwarding of complaint	The complaint is forwarded to relevant persons (site manager on construction sites and experts of the PIU) responsible for handling the complaint in not later than three working days upon receiving the complaint (except for any emergent complaint, which would be handled as appropriate).
Evaluation of a complaint	Evaluating the complaints within 10 working days and determining whether the complaint meets the admissibility criteria. If the complaint is not valid, providing relevant explanation to the complainant.
Response for a complaint	If the complaint is valid, identifying and taking corrective measures for resolving the complaint in not later than 15 working days upon receiving. If resolving the complaint would take longer, a partial response could be provided to the complainant and fill the Grievance Closeout Form All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided. At this point, it should be noted that the action taken and the result of this anonymously recorded grievance should be shared on the ŞMM website, so that anonymous complainants is informed about their complaint and the results.
Recording the result of a complaint	Recording the result of the complaint in register table.
Right to Appeal	If the complaint cannot be resolved with the existing process, applicants can always apply to relevant legal institutions. Such institutions can be summarized as follow: • Civil Courts of First Instance • Administrative Courts • Commercial Courts of First Instance • Labor Courts, and • Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

7 MONITORING AND REPORTING

7.1 Summary of How SEP Implementation will be Monitored and Reported

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

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

The SEP is a dynamic document and will be reviewed, updated and approved by ILBANK when necessary (e.g. changes in the design of sub-project components according to Environmental and Social Monitoring Reports (ESMRs), stakeholders' requests/grievances regarding the sub-project. Implementation of the SEP throughout the implementation of the sub-project, elimination of non-conformities, etc.). SUSKI will be responsible for making a statement through communication channels for each updated version of the SEP.

SUSKI will monitor the sub-project throughout its lifetime considering the stakeholder engagement process. The approved SEP will be reviewed biannually and updated if required according to the sub-project improvements and the unexpected public reactions. The GM established by the SUSKI will be used effectively and the statistical summary of the outputs of GM will be reported to ILBANK together with all the requests received, resolved and unresolved, Grievance Register, Grievance Monitoring Table and Environmental and Social Monitoring Reports (ESMRs) on a monthly basis. With monthly reporting, total number of grievances, monthly number of grievances, distribution of grievances by subject, gender, grievances answered within 7 days, grievances resolved within 30 days, list etc. is necessary.

Annex A: Field Visit Photos





Annex B: Sample Grievance Form

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

Annex C: Sample Grievance Close Out Form

 ŞANLIURFA BÜYÜKŞEHİR BELEDİYESİ SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĞÜ	SUSKI SOLAR POWER PLANT PROJECT
	GRIEVANCE CLOSE OUT FORM
Reference form:	
1. DETERMINATION OF CORRECTIVE ACTION	
1	Form of Communication
2	Telephone / Toll Free Line ☐
3	Face to Face Meeting ☐
4	Website / Email ☐
5	Other (Explain) ☐
2. CLOSE OUT THE GRIEVANCE	
<i>This section will be filled and signed by the Complainant in case the grievance stated in the "Grievance Registration Form" is resolved</i>	
Name Surname / Signature of the Person Closing the Grievance/Date	Name Surname / Signature of Complainant/Date

Annex D: Sample Consultation Form

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

Annex-E: Sample Grievance Register Log

Date of Grievance	Name of the Complainant	Subject of Grievance	Responsible Party	Corrective Action	State of Grievance Closure	Date of Closure	Remarks